



Killduff Telephone Company
PO Box 306
Sully, Ia 50251
641-798-4690

Killduff Telephone Company Robocall Mitigation Plan

This document provides details on Killduff Telephone Company's robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

Killduff Telephone Company, Operating Company Number 747C, is eligible for the continuing extension of the STIR/SHAKEN implementation deadline as a small voice service provider §64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Killduff Telephone Company provides local service to 140 customers, fewer than 100,000 voice subscriber lines. All customers are served on the non-IP portions of the network which relies on TDM technology that cannot initiate, maintain, or terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension §64.6303(a)(2), Killduff Telephone is an active member of the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Robocall Mitigation Plan

All voice traffic that originates on Killduff network is subject to the following Robocall Mitigation Plan.

Reasonable Steps

Killduff Telephone monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are analyzed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short time frame
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Killduff retains the originating and terminating call detail usage records for a minimum of 18 months.



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Investigation

Killduff investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls.

As of this filing Killduff has not had any originating robocalls detected in its network by the internal analytics. Nor has Killduff received any complaints from its customers.

Enforcement

If it is determined that a Killduff customer is in violation of its acceptable use policy in any part of its network, Killduff will either warn the customer to stop such practices or terminate their service.

Know Your Customer

Killduff has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Killduff vets all residential and business customers, validates their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

Contractual Provisions with End-users

All new customers acknowledge a statement on the service application which states users are prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

International Call Originators

The Provider is not currently an international voice service provider. If at any time the Provider does sell its services to customers which are international call originators using North American Numbering Plan resources, it will familiarize itself with and develop best practices for fully vetting such customers and performing telephone number validation on all international originated calls.

Upstream Provider Knowledge

Killduff knows all carriers from which it receives traffic. Killduff has confirmed that all carriers in which Killduff exchanges traffic are listed in the Robocall Mitigation Database.

Killduff has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Included as part of **Appendix A** to this Robocall Mitigation Plan document is a list of the Provider's current, immediate "Upstream Provider(s)" along with the contact information for each.



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Roll In the Call Chain

Killduff Telephone is a voice service provider without the STIR/SHAKEN obligation in its Non-IP network because Killduff's entire network relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Traceback

Killduff is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. Killduff will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within 24 hours.

Robocall Mitigation Database Eligibility

Killduff has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Killduff has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Third Party Analytics

The Provider also uses third-party analytics to further assist and prevent the origination of illegal robocalls on its network. Included in Appendix A is the name of the vendor (s) used along with a description of the call analytics system(s) used to identify and block illegal robocall traffic.

Appendix A

Traceback Request Single Point of Contact:

Name: John Williams

Title: Manager

Phone Number: 641-798-4690

Email address: johnw@sullytel.com

Upstream Provider Information:

Name of Upstream Provider: Aureon

Nature of Business: Tandem Switch Provider, Wholesale Long-Distance Provider

Network Location of Upstream Provider: West Des Moines, IA

Name of Contact: Chris Davis

Title: Regulatory Manager

Phone Number: 515-830-0408

Email Address: chris.davis@aureon.com

Call Analytics Vendor Name and Description of System:

Name of Vendor: TransNexus

Description of the call analytics system

Killduff Telephone utilizes a third-party "Analytics" platform jointly provided by TransNexus and Aureon to support the effectiveness of its Robocall Mitigation Plan. This includes, as examples, the use of "Telecom Fraud Prevention" and "Robocall and Telephone Denial of Service (TDos) Prevention" services, which include more specifically the use of the following methods/tools as a means of preventing and blocking fraudulent and illegal robocalls on its network: the use of CDRs and related reports for determining mitigation actions; use of SIP Analytics enabling real time traffic analysis and detection and mitigation of robocalls at origination; use of blacklisting and whitelisting to mitigate calls with specific attributes; use of CAPTCHA gateway services to distinguish whether calls are from humans or auto dialers; use of a "Shield" database that screens calls at origination for calling numbers that are invalid, high-risk, or appear on "Do Not Originate" lists; and use of reputation look up services on calling numbers at origination.