

Piedmont Rural Telephone Cooperative ROBOCALL MITIGATION PLAN (RMP)

Piedmont Rural Telephone Cooperative, Inc., hereafter referred to as “Piedmont” is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

All of Piedmont’s customers are served on a non-IP network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Piedmont’s network is connected to carriers that do not support IP connectivity; therefore, Piedmont cannot upgrade the Non-IP network to IP connectivity.

Piedmont submits this report detailing its practices and procedures to prevent and mitigate the origination of illegal robocalls on its network.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network.

Risk Assessment. Piedmont is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Piedmont has not received information suggesting that robocalls are originated on its network. Therefore, Piedmont does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: Piedmont conducts due diligence on new and renewing customers, confirming the customer’s identity and, if it is a business, its incorporation documents. The Company confirms the customer’s service address for all customers.

- Piedmont verifies customer’s credit history and business reputation prior to providing service.
- Piedmont verifies customer information when contracts are renewed or services are added.
- Piedmont verifies the customer’s identity and their right to use the telephone number presented on calls.
- Piedmont has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer if the customer is originating fraudulent calls.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

Piedmont Implements mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Piedmont has in place a Prohibited Use of Voice Services and Enforcement and/or an acceptable use policy.

Piedmont also has in place policies designed to detect and prevent fraudulent traffic on its network.

- Piedmont uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Piedmont has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Piedmont will suspend and/or terminate service to the customer.
- Piedmont blocks the following types of calls by default:
 - ✓ ☒ Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]
 - ✓ ☒ Calls from DNO numbers as per FCC Order [2017 Call Blocking Order]

Upstream Provider Knowledge

Piedmont knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Piedmont has also reviewed the connected carrier's robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Piedmont, via its call analytics vendor, monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Piedmont's network. Piedmont does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Piedmont's network to carry or process a high volume of illegal traffic. In addition, Piedmont is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Responding to Traceback Requests

Piedmont commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Piedmont commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.