

Five Area Telephone Cooperative, Inc - Robocall Mitigation Plan

Five Area Telephone Cooperative, Inc (Five Area), Operating Company Number 2071, 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).

Five Area provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Five Area's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Five Area also originates calls via SIP connections within its network.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Five Area is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Five Area's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Five Area has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Five Area has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Five Area's network with the Five Area certificate.

Robocall Mitigation Plan

All voice traffic that originates on Five Area's network is subject to the following Robocall Mitigation Plan. Call Analytics Five Area uses TNS' Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity.

Five Area blocks the following types of calls by default:

- Calls originating from invalid numbers per FCC Order
- Calls from DNO numbers as per FCC Order

Five Area has also deployed call authentication, call labeling, and call blocking services provided by TNS.

Investigation

Five Area investigates calls identified by TNS as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls. In addition, if Five Area has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Five Area will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Five Area customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Five Area will either warn the customer to stop such practices or terminate their service as allowed per Five Area policy.

Know your Customer

Five Area has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Five Area thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Upstream Provider Knowledge

Five Area knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Five Area has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Five Area does not directly receive traffic from any foreign originating or intermediate provider. No provider is using the Five Area network to carry or process a high volume of illegal traffic. In addition, Five Area is now incorporating traceback and prohibited traffic language in all new contractual agreements with upstream carriers.

Role In the Call Chain

Five Area is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. Five Area is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Five Area 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. Five Area will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Five Area has never been involved in formal law enforcement or regulatory investigation into suspected unlawful robocalling. Five Area has not been prohibited from filing in the Robocall Mitigation Database (RMD).