

West Plains Telecommunications - Robocall Mitigation Plan

West Plains Telecommunications (West Plains), Operating Company Number 0480, 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).

West Plains provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of West Plains 's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. West Plains 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)), West Plains 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 West Plains' third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

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

Robocall Mitigation Plan

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

West Plains blocks the following types of calls by default:

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

West Plains has also deployed call authentication, call labeling, and call blocking services provided by TNS.

Investigation

West Plains 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 West Plains has any other reason to suspect illegal robocalling or spoofing is taking place over its network, West Plains 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 West Plains customer is using our network to fraudulently spoof calls or to originate illegal robocalls, West Plains will either warn the customer to stop such practices or terminate their service as allowed per West Plains policy.

Know your Customer

West Plains has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. West Plains 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

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

Role In the Call Chain

West Plains is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. West Plains 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

West Plains 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. West Plains 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

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