

Robocall Mitigation Compliance with TRACED Act

Date	Change Summary
February 21, 2024	Update for compliance with the Sixth Report and Order

This mitigation plan is submitted on behalf of Peoples Rural Telephone Cooperative Inc., an incumbent local exchange carrier, and its wholly owned subsidiary, Peoples Telecom, LLC, a provider of competitive local exchange services. Each company serves rural communities in the state of Kentucky and share operations, including their respective Robocall Mitigation Plans and will be referred to as PTC throughout this document.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

PTC 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).

PTC is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as PTC's third-party representative on the ATIS Non-IP taskforce working group.

PTC will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market

Status of STIR/SHAKEN Implementation

PTC has implemented authentication and verification with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that supports SIP calls.

PTC is using the Inteliquent/Neustar hosted solution to attach attestation to PTC calls utilizing a certificate issued to PTC and hosted by TransUnion.

II. Robocall Mitigation Plan

PTC is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. PTC uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which PTC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Analytics

Through its partnership with Inteliquent, PTC's traffic delivered to Inteliquent as SIP is analyzed by Inteliquent for robo call violations. Any such traffic identified is suspended by Inteliquent and referred to PTC for remediation.

PTC is actively exploring options for additional network monitoring within its TDM network to allow it to flag call patterns indicative of potential illegal robocalling.

Know Your Customer

PTC utilizes the mitigation technique of “Know Your Customer.” PTC is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

PTC has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

PTC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- An PTC representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

PTC provides a subscription-based, non-commercial legal robocalling product and we educate any subscribers or potential subscribers (such churches, school systems) regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product.

PTC serves a small number of long-time business end users with large volume calling capability who are being directly contacted to review with them PTC’s policies and efforts to prevent the PTC network from being used for illegal robocalling.

III. Traceback and Enforcement Cooperation

PTC will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). PTC commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither PTC nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.