

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Albion Telephone Company, Inc. dba ATC Communications "ATC" submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures ATC has in place to mitigate illegal robocalls as of February 26, 2024. ATC may modify, add, delete, or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

STIR/SHAKEN Implementation

ATC believes that all calls that originate on our network are subject to a robocall mitigation program and will comply fully with all conditions set forth in the FCC's 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally. No prior certification has been removed by the FCC and ATC has not been prohibited from filing in the Robocall Mitigation Database. ATC has not been subject to any FCC, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

ATC is implementing STIR/SHAKEN through use of the TransNexus ClearIP solution. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

ATC has implemented this solution in the IP portions of its network as of June 30, 2021.

- ☐ My traffic is fully attested.
- ☒ My traffic is partially attested.
- ☐ None of my traffic is yet attested, however I have implemented the Robocall Mitigation Plan outlined below.

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 as of February 26, 2024. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.



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

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: ATC 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.

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

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- ATC has in place an enforceable terms of use and/or an acceptable use policy. ATC also has in place policies designed to detect and prevent fraudulent traffic on its network.
- ATC uses TransNexus ClearIP analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If ATC 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, ATC can suspend and/or terminate service to the customer.
- ATC blocks the following types of calls by default:
 - ☒ Calls originating from invalid numbers per FCC Order 17-151
 - ☒ Calls from DNO numbers as per FCC Order 17-151

Responding to Traceback Requests

- ATC has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- ATC will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, ATC will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

ATC will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, ATC will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

ATC has deployed call authentication, call labeling, and call blocking services provided by TransNexus ClearIP. We have made great strides to protect our networks and consumers from harmful calls. ATC is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Bradshaw", is written over a light blue horizontal line.

Kyle Bradshaw
General Manager

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