

PANHANDLE TELECOMMUNICATION SYSTEMS, INC
ROBOCALL MITIGATION PLAN

PTSI, Operating Company Number 6944 and its affiliate PTCL, Operating Company Number 2016, is eligible for the continuing STIR SHAKEN implementation deadline under FCC rules §64.6304(a)(2) and §64.6304(d).

PTSI qualifies 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 landline network §64.6304(d).

PTSI provides local landline services to over 1,000 customers, fewer than 100,000 voice subscriber lines. The vast majority of these customers are served on the non-IP portions of PTSI's landline network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), PTSI is a member of NTCA. NTCA participates on the ATIS Non-IP taskforce working group which develops non-IP call authentication solutions. NTCA is serving as PTSI's third party representative on the ATIS Non-IP taskforce working group.

PTSI also originates calls via SIP connections within its network. PTSI has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. PTSI has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of PTSI's landline network.

Consistent with § 64.6303 (a)(1), PTSI is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. PTSI has contacted all of its connected carriers and requested to convert the Non-IP connections to IP connections. The carriers stated they cannot support IP connections at this time.

ROBOCALL MITIGATION PLAN

All voice traffic that originates on PTSI's landline network is subject to the following Robocall Mitigation Plan.

PTSI has contracted with Ribbon Call Trust Services to provide robocall analytics and reputation scoring of our network's outbound landline traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if our network originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. PTSI has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

In addition, all customers sign a service agreement when new service is activated or existing service is renewed. The service arrangement includes notice that PTSI prohibits use of its network for the initiation of fraudulent spoofing and robocalls. If end users are found in violation of the service terms, the end user's service may be terminated.

PTSI knows all the carriers from which it receives traffic. PTSI proactively 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 PTSI's network to terminate.

PTSI has confirmed that all carriers in which PTSI exchanges traffic and from which PTSI receives traffic are listed in the Robocall Mitigation Database.

All interconnection agreements PTSI has with its competitors includes a commitment to follow the FCC's traceback rules.

PTSI has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

PTSI is a landline voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network which serves 30 end-users. PTSI is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of PTSI's network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

PTSI 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. PTSI will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

PTSI has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

PTSI has not been prohibited from filing in the Robocall Mitigation Database (RMD).

PTSI posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.

PTSI, Operating Company Number 468B, is eligible for the continuing STIR SHAKEN implementation deadline under FCC rules §64.6304(a)(2) and §64.6304(d).

PTSI qualifies for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2)).

PTSI provides local wireless services to over 8,000 customers, fewer than 100,000 voice subscriber lines.

PTSI also originates calls via SIP connections within its wireless network. PTSI has contracted with Inteliquent/Sinch as a 3rd party provider, to sign all SIP calls that originate on its network with the STI certificate issued to PTSI from its Certificate Administrator. PTSI has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Inteliquent/Sinch signs the calls originating on the IP portions of PTSI's wireless network.

All voice traffic that originates on PTSI's wireless network is subject to the following Robocall Mitigation Plan.

PTSI has contracted with Ribbon Call Trust Services to provide robocall analytics and reputation scoring of our network's outbound wireless traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if our network originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. PTSI has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

In addition, all customers sign a service agreement when new service is activated or existing service is renewed. The service arrangement includes notice that PTSI prohibits use of its network for the initiation of fraudulent spoofing and robocalls. If end users are found in violation of the service terms, the end user's service may be terminated.

PTSI knows all the carriers from which it receives traffic. Inteliquent/Sinch proactively 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 PTSI's network to terminate.

PTSI has confirmed that all carriers in which PTSI exchanges traffic and from which PTSI receives traffic are listed in the Robocall Mitigation Database.

All interconnection agreements PTSI has with its competitors includes a commitment to follow the FCC's traceback rules.

PTSI has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

PTSI is a wireless voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its wireless network which serves over 8,000 end-users.

PTSI 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. PTSI will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

PTSI has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

PTSI has not been prohibited from filing in the Robocall Mitigation Database (RMD).

PTSI posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.