

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC
DOCKET NO. 17-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

S&T Telephone Cooperative Association, Inc.
S & T Communications, LLC
320 Kansas Ave,
Brewster, KS 67732

February 26, 2024

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

S&T Telephone Cooperative Association, Inc. and S&T Communications, LLC (collectively, “S&T”) received the small voice service provider extension of the STIR/SHAKEN implementation deadline under §64.6304(a) of the FCC’s rules.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps S&T has taken and continues to take to avoid originating illegal robocall traffic.

- S&T follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.
(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)
- S&T requires all business customers to adhere to the terms and conditions agreement that contain provisions that allow for termination in the event high-volume origination services are abused by new and renewing customers. S&T will not hesitate to enforce them if necessary.
- S&T has partnered with [REDACTED] to help mitigate Robo Calls / Fraudulent calls.

[REDACTED]. We receive [REDACTED]. If there is any alarming activity, [REDACTED]. Decisions are made if further actions are needed after speaking with the customer. [REDACTED]

- S&T has partnered with [REDACTED].
- S&T commits to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.
- S&T will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

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Status of STIR/SHAKEN Implementation

S&T authenticates and verifies with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls. In addition, S&T authenticates and verifies with STIR/SHAKEN voice traffic that originates on the IP portions of the company's network that support SIP calls before handoff to an intermediate or terminating service provider. Finally, S&T 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.

Additional Information

1. S&T has "know-your-upstream provider" procedures in place designed to mitigate illegal robocalls. [REDACTED]

[REDACTED]. S&T's customer service, technician, and business sales teams work closely with new customers to understand their needs, and coordinate with each other to report any potential issues. S&T has contractual provisions that give it the unilateral right to immediately disconnect service and terminate a customer service agreement where a customer uses the service in an unlawful manner. S&T has never had a need to exercise its contractual remedy to terminate service for unlawful operation.

2. [REDACTED].
3. Business names and primary address used by the voice service provider:

S&T Telephone Cooperative Association, Inc.
320 Kansas Avenue
P.O. Box 99
Brewster, KS 67732

S & T Communications, LLC
320 Kansas Avenue
P.O. Box 99
Brewster, KS 67732

4. The only other business name previously used by S&T is S&T Telephone Cooperative, Inc.
5. S&T is not a foreign voice service provider.
6. Brian Siegfried is the individual within S&T responsible for addressing robocall mitigation-related issues:
Title: Operations Manager
Department: Operations
Business Address: 320 Kansas Avenue, Brewster, KS 67732
Telephone Number: 785-694-2256

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Email address: brian.siegfried@sttelcom.com

7. S&T has not been prohibited from filing in the Robocall Mitigation Database.
8. Ownership information:
S&T Telephone Cooperative Association, Inc. (FRN: 0002285260) is member-owned, with no single member owning 10% or more. S&T Communications, LLC (FRN: 0008460081) is 100% owned by S&T Telephone Cooperative Association, Inc.