

3 Rivers Telephone Cooperative, Inc., dba 3 Rivers Communications Robocall Mitigation Plan

3 Rivers Telephone Cooperative, Inc., dba 3 Rivers Communications (“3 Rivers”), is a local exchange carrier headquartered in Fairfield, MT, that offers voice and Internet service. 3 Rivers is fully committed to utilizing its resources to prevent illegal robocalls from being processed on its network.

3 Rivers serves approximately 12,000 voice lines across 25 ILEC and 3 CLEC exchanges. Our goal is to prevent any 3 Rivers customer from originating illegal robocalls and to protect our customers from receiving illegal robocalls as much as possible. Although 3 Rivers has capability to send/receive voice to end users via Internet Protocol, most of our voice traffic still travels over TDM trunks.

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

3 Rivers is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider, as defined in §64.6304 (a)(2), that has non-IP portions within its network §64.6304(d).

3 Rivers provides local service to fewer than 100,000 voice subscriber lines. Some 3 Rivers customers are served on the non-IP portions of the 3 Rivers network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

In addition, per §64.6303(a)(1), 3 Rivers 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 throughout its network. However, the 3 Rivers non-IP network is connected to carriers (via TDM) that do not support IP connectivity; therefore, 3 Rivers cannot upgrade its Non-IP network (TDM network) to IP connectivity.

Per §64.6303(a)(2), 3 Rivers can provide the Commission with documented proof that it is participating as a member of a working group, industry standards group, or consortium that is working to develop a non-Internet Protocol caller identification authentication solution, or actively testing such a solution.

Status of STIR/SHAKEN Implementation

Voice traffic that originates from or terminates on the network of 3 Rivers via IP trunking is authenticated or verified with STIR/SHAKEN. In addition, 3 Rivers 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. 3 Rivers will continue to evaluate its own network and those of our upstream carriers for the

feasibility of implementing a full SIP network for our call traffic. 3 Rivers is committed to protecting our customers from illegal robocalls by utilizing the most effective resources available that are compatible with our network and are financially reasonable for the fiscal health of the cooperative.

Specific Reasonable Steps Taken to Avoid Processing Illegal Robocall Traffic

3 Rivers uses TNS' Call Guardian call analytics service on its originating traffic. The TNS Call Guardian Authentication HUB (CGAH) Universal Call Blocking services uses the DNO list to block calls from numbers on the DNO list. Call Guardian utilizes the DNO list that is based on invalid numbers, the Industry Traceback Group (ITG) DNO list, and individual carrier DNO lists to block calls.

3 Rivers has also implemented internal call monitoring measures to prevent caller ID spoofing on our network. Through our Metaswitch softswitch, we only allow a customer to originate calls from a number that identifies in our switch as a number that has been assigned to that customer. This prevents a 3 Rivers customer from originating calls with a spoofed caller ID number. When our softswitch determines that a 3 Rivers customer is attempting to originate a call from a number not assigned to them, the switch will not allow the call to go through. This is a decisive and effective measure that will prevent the origination of illegally spoofed robocalls while still allowing legal robocalls.

In addition, 3 Rivers has implemented STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub on the IP portions of its voice network. 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).

3 Rivers has contracted with TNS for terminating call analytics services. TNS call reputation scoring appropriately marks/blocks calls that are delivered via TDM to our network.

3 Rivers is a small service provider with approximately 12,000 access lines. Our service territory is limited to a few counties in Montana. As such, we are familiar with our customers and have designated customer service representatives that handle our relationships with business customers. 3 Rivers also maintains call logs and tracks on a regular basis the number and length of calls traveling over its SIP and TDM trunks. If 3 Rivers discovers through a review of call logs that any customer is originating an excessive number of calls, or we receive a complaint about a 3 Rivers customer originating excessive calls, 3 Rivers will contact that customer to determine whether any suspected illegal robocalling is taking place. 3 Rivers will then take mitigating steps as necessary.

Any special requirements for 3 Rivers customers whose high originating call volume was lawful will be determined on a case-by-case basis and documented. If necessary, special contracts will

be established clarifying the proper uses of call origination services, and service will be terminated for abuses.

If 3 Rivers determines a customer's excessive originating call volume is a result of illegal robocalling, we will immediately notify and inform that customer and take appropriate action. This could include implementing mandatory account codes for out dialing; barring calls to local numbers, national numbers, international numbers, or any combination of the three; blocking outgoing calls, incoming calls, or both; and/or severing 3 Rivers' relationship with that customer if no other action solves the problem.

3 Rivers' Acceptable Use Policy clearly outlines for customers that actions such as robocalling can result in termination of service. The policy is on our website: <https://3rivers.net/acceptable-use-policy>

We fulfill the 'Know your customer' obligation through the process of requiring cooperative membership as a requirement of service as well as only providing service to fixed locations within our service area.

We fulfill the 'Know your upstream providers' by having a limited number of upstream providers. They are all national companies that we have had relationships with for 10 years or longer. Any potentially new upstream connections must be reviewed by senior management and will include the language from our Acceptable Use Policy. 3 Rivers has reviewed the robocall mitigation plans filed by its upstream providers. No provider is using the 3 Rivers network to carry or process a high volume of illegal traffic. 3 Rivers 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 and notified that, if the traffic does not cease, the calls may be blocked from entering the 3 Rivers network. In addition, 3 Rivers is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Responding to Traceback Requests

- 3 Rivers 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. 3 Rivers commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.
- 3 Rivers has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual.

Cooperation with State and Federal Regulators

3 Rivers will cooperate with state and federal regulators to prevent any and all illegal robocalls.

Specifically, 3 Rivers 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.