

Robocall Mitigation Plan

Lone Rock Cooperative Telephone Company

Executive Summary

The purpose of this Robocall Mitigation Plan (RMP) is to implement best practices, procedures and policies to mitigate or reduce originating illegal traffic (aka robocalls).

Lone Rock Cooperative Telephone Company (Lone Rock) will:

1. Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - a. <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
2. Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
3. Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
 - a. Investigate suspected illegal traffic
 - b. Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - i. Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
4. Prevent any calls being blocked to or from emergency services
5. Implement the following best practices, policies and procedures as part of Lone Rock's RMP

Point of contact for this RMP:

Primary Contact: Josh Adams
Title: General Manager
Address: 215 Maine Street, Lone Rock, IA 50559
Phone: 515-925-3271
Email: manager@lonerocktel.com

Regulatory Background

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on SIP/IP traffic on their networks as well as to implement an RMP on non-SIP/IP traffic (aka TDM traffic) on their network.

The FCC granted a continuing extension for voice service providers with non-IP networks (aka TDM) from implementing STIR/SHAKEN authentication. Below are the rule sections that apply to Lone Rock:

§ 64.6304 Extension of implementation deadline.

(a) *Small voice service providers.*

(2) For purposes of this paragraph (a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).

(d) **Non-IP Networks.** Those portions of a voice service provider or gateway provider's network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls are deemed subject to a continuing extension. A voice service provider subject to the foregoing extension shall comply with the requirements of § 64.6303(a) as to the portion of its network subject to the extension, and a gateway provider subject to the foregoing extension shall comply with the requirements of § 64.6303(b) as to the portion of its network subject to the extension.

§ 64.6303 Caller ID authentication in non-IP networks.

(a) Except as provided in §§ 64.6304 and 64.6306, not later than June 30, 2021, a voice service provider shall either:

(1) Upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework as required in § 64.6301 throughout its network; or

(2) Maintain and be ready to provide the Commission on request with documented proof that it is participating, either on its own or through a representative, including third party representatives, 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.

Basis for Exemption

Lone Rock is a “small voice service provider” that has approximately 174 voice service subscriber lines aggregated over all of the company’s affiliates. Lone Rock’s voice network is currently non-IP for all outgoing traffic to the tandem and therefore qualifies for the exemption. Lone Rock is required to comply with the requirements of §64.6303 (a). This non-IP tandem connection carries all traffic to the outside world and relies on a technology that cannot originate, carry, process, or terminate SIP calls.

Meeting §64.6303(a)(2) Obligations

Lone Rock is a member of NTCA and the National Exchange Carrier Association (NECA) which act as its third party representatives to develop a non-internet Protocol caller identification authentication solution. NTCA and NECA are members of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Roll in the Call Chain

Lone Rock is a voice service provider providing voice service and broadband services to end user customers inside its regulated serving area. Lone Rock does not have a STIR/SHAKEN obligation at this time due to having a non-IP network (see above).

Operating Company Number (OCN)

Lone Rock’s Operating Company Number (OCN) is 1228.

Status of participation in the Robocall Mitigation Database (RMD)

Lone Rock has not been prohibited from filing in the RMD.

Commission, law enforcement and/or regulatory action or investigation related to spoofing or suspected unlawful robocalls

Lone Rock has not been involved in any Commission, law enforcement and/or regulatory action related to spoofing or suspected unlawful robocalls. Lone Rock has not been removed from the RMD and precluded from refiling due to deficiencies needing to be cured. Lone Rock authorization has not been revoked due to continuing violations of the Commission’s robocall mitigation rules.

Prior two years status

In the past two years Lone Rock has not been the subject of a formal Commission, law enforcement and/or regulatory action or investigation with accompanying findings of actual or suspected wrongdoing due to Lone Rock transmitting, encouraging, assisting or otherwise facilitating illegal robocalls or spoofing or suspected unlawful robocalls.

Know your upstream provider

Lone Rock receives the majority of its traffic from Aureon, a Centralized Equal Access provider in Iowa. Aureon blocks traffic from carriers that are not in the RMD or have been removed from the RMD.

Know your Customer

Lone Rock takes the following steps to prevent new and existing customers from originating robocalls over its network:

- The vast majority of Lone Rock subscribers are defined as a “direct” retail consumer or commercial end users located inside our serving areas
 - These subscribers are best defined as residential and small business customers and Lone Rock will:
 - Validates the residential or business customer’s identity
 - Validates the physical location which will be the fixed location where service is established
- Lone Rock does not have any commercial VoIP customers. If they would obtain one or more, Lone Rock will gather the following information as reasonably practical to “Know your Customer”:
 - Physical business location
 - Contact person’s information
 - State or country of incorporation
 - Federal tax ID number
 - Nature of the customer’s business
- Lone Rock does not offer service currently to wholesale subscribers

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Long Distance Traffic

Lone Rock uses a third party administrator, Aureon, for call analytics systems used to identify and block illegal traffic. Aureon, an end-to-end technology solutions organization, provides a Caller Identification Authentication (CIDA) service which includes Outbound Shield technology. This Outbound Shield uses a curated list of high-risk phone numbers and detects invalid numbers. If the calling number has been reported as spam, the calling number will be prevented from completing outbound calls.

See Appendix A for a copy of the certification by Lone Rock for Aureon's CIDA service.

Additionally, Lone Rock has implemented the following best practices, policies and procedures to mitigate unlawful illegal traffic (robocalls):

- Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
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- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
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- Investigate suspected illegal traffic
 - Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
- Prevent any calls being blocked to or from emergency services

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Local and/or EAS Traffic

Lone Rock has implemented the following best practices, policies and procedures to mitigate unlawful illegal traffic (robocalls):

- Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
- Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
- Investigate suspected illegal traffic
 - Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
- Prevent any calls being blocked to or from emergency services
- Nearly all residential and business lines can place only one call at a time
- All residential and business lines are only able to place calls originating from their own phone number
- Only numbers residing in our switch are assigned to residential and business lines
- Investigate any complaints about legitimate calls being blocked

Appendix A Third Party Service Agreements



7760 Office Plaza
Drive South West
Des Moines, Iowa
50266

PRODUCT EXHIBIT CALLER ID AUTHENTICATION

This Product Exhibit for Caller ID Authentication is made on February 1st, 2021 (the "Effective Date") by and between Iowa Network Services, Inc. DBA Aureon Network Services, an Iowa corporation (Aureon), and Lone Rock Cooperative Telephone Company (Customer). This Product Exhibit and any referenced appendices and the Product Description Schedules for services named in this Product Exhibit, are attached to and by this reference made part of the Master Services Agreement ("MSA") between Iowa Network Services, Inc. DBA Aureon Network Services (Aureon) and Lone Rock Cooperative Telephone Company (Customer) dated August 17th, 2010. Aureon and Customer may be referred to herein individually as a "Party" and jointly as the "Parties".

1. RATES

The Subject to Aureon's right to adjust rates under Section 3 of this Product Exhibit, Customer agrees to pay Aureon for the Service at the following rates for the applicable billing periods:

List of Customer OCN(s): 1228

2. INSTALLATION AND IMPLEMENTATION

Customer agrees to pay Aureon a one-time Installation and Implementation fee to be billed upon Service Commencement.

3. RATE ADJUSTMENTS

Aureon shall have the right to terminate the Service under this Agreement if Aureon decides to discontinue the product line described in the Product Description Schedule. For termination under this section, Aureon will provide written termination notice to Customer at least sixty (60) days before discontinuing Service. Customer may, at its discretion, terminate this Agreement at any time after receiving notice of termination from Aureon.

4. TERM AND RENEWAL

- a. This Product Exhibit shall become effective as of the Effective Date.
- b. The Term of this Product Exhibit will be thirty-six (36) months commencing on Service Commencement. It shall thereafter renew in successive terms of one (1) year each, subject to the right of either Party to terminate this Product Exhibit by giving
- c. the other party written notice of termination no less than sixty (60) days prior to the expiration of the then current term. The initial term and each renewal term shall be referred to collectively as the "term."
- d. The Service Commencement shall be defined as the earlier of the date that services begin or the date that Service could have begun absent delays on the part of the Customer.
- e. Billing shall commence on the Service Commencement.

CALLER ID AUTHENTICATION

PROPRIETARY AND CONFIDENTIAL



7760 Office Plaza Drive South

West Des Moines, Iowa 50266

- f. In the event of Customer's early termination of this schedule, Customer shall pay Aureon a termination fee equal to the remaining payments under this Product Exhibit for the remainder of the then effective term, including any extension or extensions.

5. BILLING AND PAYMENT

- a. Any amounts due to Aureon under this Product Exhibit shall be due and payable upon receipt by Customer of an invoice, statement or other notice ("Invoice") as described in the Master Services Agreement ("MSA").
- b. If Customer disputes an Aureon Invoice, Customer shall nonetheless make payment in accordance with the Invoice as submitted. Customer shall have the right to dispute any amount invoiced and paid, and must notify Aureon and Customer's billing service provider, if any, in writing of its dispute within 60 calendar days of the date of the Invoice, or the right to dispute shall be waived. Parties shall make a reasonable effort to resolve the dispute within 30 days of the written notice of dispute.
- c. Any adjustment related to a disputed amount shall be reflected on the next Aureon Invoice issued after resolution. If the dispute is ultimately resolved in favor of Customer, Customer shall be entitled to adjustment from Aureon in accordance with the terms of the resolution.

6. ACKNOWLEDGEMENT OF AGREEMENT

Each Party acknowledges that it has read this Product Exhibit, understands it, and has the authority to accept the conditions as written. Each Party acknowledges that it has full power and authority to enter into and perform this agreement, and that the individual or individuals executing this agreement on behalf of each party have been properly authorized and empowered to enter into this agreement.

By executing this Product Exhibit both Parties agree to the conditions set forth in the MSA, the Product Description Schedule and this Product Exhibit.

Lone Rock Telephone Company

215 Maine Street

Lone Rock, IA 50559

(Company Legal Name)

Name: Dan Meyer

Signature: Dan Meyer

Title: GM

Date: 2/22/21

Aureon Network Services

7760 Office Plaza Drive South

West Des Moines, IA 50266-2336

Name: Scott Behn

Signature: Scott Behn

Title: CEO

Date: Feb 24, 2021

Certification of Robocall Mitigation Plan by Officer of the Company

I, Josh Adams, certify that the above information is true and correct to the best of my knowledge. My title is, General Manager, and am an officer of the company.