

**Basin Office**

PO Box 310 - 405 S 4th St
Basin, WY 82410
307.568.3357

Billings Office

1321 Discovery Dr.
Billings, MT 59102
406.248.4204

Cody Office (Corporate)

1601 S. Park Dr.
Cody, WY 82414
307.586.3800

Lovell Office

451 Shoshone Ave
Lovell, WY 82431
307.548.2275

Powell Office

401 S Bent St, #4
Powell, WY 82435
307.754.9160

Your Superior Hometown Service Provider • 1.800.354.2911 • www.tct.net

FCC Certification Filing for RMD and STIR/SHAKEN Full Compliance Certification Filing**Business Names Current:**

Tri-County Telephone Association Inc. Corporation - Primary

TCT – Other Business Name in Use

Primary Address:

1601 S Park Dr.

Cody, WY 82414

Business Names Used Previously:

TCT West Inc.

Tri-Tel

Filer Type:

Domestic Voice Service Provider

Contact for Robocall Mitigation related Issues:

Primary Contact:

Michelle Shipley - Switching Administrator

phone: 307-568-3357 email: switching@tctstaff.com

Secondary Contact:

Bryan Terry - Chief Technology Officer

Phone: 307-568-3357 email: bryan.terry@tct.net

Practices and Procedures for RMD STIR/SHAKEN:

Tri County Telephone Association Inc. in partnership with Metaswitch has implemented RMD and STIR/SHAKEN practices using the Metaswitch/TNS Call Guardian Authentication Hub below are the compliances and processes to address RMD and STIR/SHAKEN that meet compliance with standards STIR: RFC 8224, RFC 8225, RFC 8226 • SHAKEN: ATIS 1000074, ATIS 1000080, ATIS 1000082:

Internal review and escalation of complaints/alerts

Tri-County Telephone (TCT) reviews robocall complaints, customer reports, and analytic alerts through the TCT Switching Department. The Switching Department performs initial triage, validates call examples (e.g., calling number, called number, timestamp, and trunk/source), and determines whether traffic is legitimate, suspicious, or indicative of illegal robocalling. When escalation is required, the Switching Department coordinates internally with appropriate operational stakeholders and, when applicable, engages external upstream/downstream partners and vendor support to investigate and implement corrective actions.

Traceback cooperation and point-of-contact workflow

TCT supports traceback and industry-led investigations through TNS Call Guardian in conjunction with the TCT Switching Department. The Switching Department serves as the primary operational point of contact for traceback-related inquiries and coordinates retrieval of relevant call details and network information, as available, to support timely investigation and mitigation.

Customer vetting / onboarding controls (business-originating voice customers)

TCT applies onboarding and validation controls for customers that originate voice traffic. As part of service activation and ongoing validation, TCT verifies ownership and association of the telephone number(s) within the applicable LATA and evaluates the customer as business or residential based on service records and calling number reputation indicators. TCT coordinates with TNS Call Guardian to confirm that customer-originated calling is appropriately scored and represented within reputation analytics. When reputation scoring or classification appears inconsistent with verified customer information, TCT works with TNS to correct scoring and reduce the likelihood of improper treatment of legitimate customer traffic. Examples include identity verification, service order authorization, validation of business name/address, confirmed point-of-contact, acceptable use policy acknowledgment, and enforcement actions for abuse.

Allow/Block list governance and approval

TCT maintains governance over allow/block list configuration and related robocall mitigation policy settings within its network. The TCT Switching Department holds authority to implement configuration changes, including adjustments to allow/block lists, after review of call behavior and assessment of unreputable or suspicious calling patterns. Changes are made to mitigate suspected illegal robocalling while minimizing impact to legitimate traffic.

Program review cadence

TCT reviews its robocall mitigation program at least quarterly and conducts additional review upon material network or vendor configuration changes to ensure robust compliance and ongoing effectiveness.

Call classification: reputation scores and categories

The TNS Call Guardian analytics engine used for call filtering as part of CGAH classifies each call according to a reputation score and category. These are as defined in the tables below.

Reputation score

Score	Definition	Supplemental Definition
-4	Worst Possible	In general severity is greatest as impact of identity theft can be catastrophic. Loss of money and time - emotional effect similar to victim of violent crime.
-3	Very Bad	Severity is deemed major as invasion of privacy can cause emotional distress. Especially in cases of repeated, harassing calls where Caller ID info doesn't support private right of action (lawsuit).
-2	Bad	Severity of harm moderate as meaningful, identifying Caller ID info supports private right of action for violations and statutory damages.
-1	Suspicious	Severity minor as negligent non-compliance involves harm caused by careless, not intentional. And end-user may bring private right of action.
0	Neutral	No reputation data available.
+1	Probably Good	Severity of harm negligible as no foreseeable risk of harm or discomfort and any foreseeable risk is no more than inconvenience.
+2	Good	
+3	Very Good	

+4	Excellent	
----	-----------	--

Reputation scores are assigned by the TNS analytics algorithm, ranging from -4 (worst) to +4 (best).

Categorization

Calls are assigned by the TNS analytics algorithm to one of the following categories.

Category	Description
normcompliant	Any person or entity with an observed calling behavior falling within the normal behavioral baseline of manually dialed calls - with no abusive, fraudulent or unlawful calling behavior reported. TNs categorized as normcompliant have a reputation score of +1 or greater. A reputation score of zero (no reputation data available) is assessed to TNs for which no network-sourced behavioral data has been observed in past ninety (90) or more days. For example: disconnected phone numbers most often result in a reputation score of "0".
robocaller	Robocalls are calls made with an autodialer or that contain a message made with a prerecorded or artificial voice. Offenders are normally straightforwardly identified as reputable entities and most commonly place calls with meaningful disclosure of identity.
spammer	Any person or entity placing automated telephone calls, telemarketing and informational, in a manner that might not comply with state and federal laws governing the use of auto-dialers. Regulatory violations are normally difficult to prosecute as there is no meaningful disclosure of identity when placing calls.
spoofers	Any person knowingly and willfully causing transmission of misleading or inaccurate Caller ID info for which there is suspicious behavior but no confirmed report or calling behavior indicative of malicious intent, which otherwise would cause categorization to graduate to potential fraud.

Category	Description
scammer/potential fraud	Any person that appears to be in reckless disregard of state and federal laws governing the use of auto-dialers, or a person using an auto-dialer in the commission of a crime of identity theft or fraud. Typically, deceptive caller ID practices are employed to avoid detection or deceitfully gain caller's trust.

Grades of service

TCT utilizes the Metaswitch/TNS Call Guardian Authentication Hub (CGAH) to invoke call analytics at the network level. TCT applies call analytics by default to protect subscribers, while maintaining the ability for individual subscribers to opt out. This ensures that the maximum volume of traffic is routed through the analytics engine, increasing the accuracy of reputation data and network protection.

Universal Call Blocking (UCB)

TCT employs Universal Call Blocking as a standard service. This protocol automatically blocks calls identified with the "Worst Possible" reputation score (-4) by the analytics function. This configuration is applied to mitigate high-risk illegal traffic before it reaches the subscriber.

Advanced Call Treatment (ACT)

TCT utilizes Advanced Call Treatment to manage calls with negative reputation scores that do not meet the threshold for immediate blocking (e.g., scores of -3). These calls are handled according to specific policy settings, such as diverting to voicemail, to reduce nuisance calls without blocking potentially legitimate traffic.

Supported call treatments

Call Treatment Protocols TCT employs the following call treatments within its Robocall Mitigation implementation to manage traffic based on reputation scoring:

Allow call

The default behavior for traffic identified as legitimate or low-risk. These calls are completed to the subscriber without interference or modification to call parameters.

Block call

For traffic identified as high-risk (e.g., -4 reputation), the system terminates the call with a specific error code. TCT utilizes the standard **603 Decline** response for these blocked calls to ensure appropriate signaling to the originating carrier.

Advice of Risk

TCT utilizes "Advice of Risk" to modify the Calling Name (CNAM) display for calls with low reputation scores that are not blocked. These calls are delivered with a modified string (e.g., "Spam Caller") to alert the subscriber of potential risk, allowing them to make an informed decision on whether to answer.

Divert to announcement

TCT maintains the capability to redirect calls to a designated announcement (Directory Number) that informs the caller of a validation failure. This allows TCT to control the treatment of the call beyond standard error codes.

Divert to voicemail

To reduce the impact of nuisance calls without blocking them outright, TCT may redirect specific traffic categories directly to the subscriber's voicemail, allowing the caller to leave a message if the call is legitimate.

Allow and block lists

TCT maintains governance over allow and block lists at both the network and subscriber levels. These lists override the standard reputation scoring algorithm to ensure that specific, verified numbers are always allowed or specific threat actors are always blocked.

A stylized signature of Bryan Terry, featuring a large 'X' followed by a cursive 'B' and 'T'.

Bryan Terry
Chief Technology Officer