

Robocall Mitigation Compliance with TRACED Act

Date	Contact/Title	Change Summary
February 22, 2024	Matthew Bailey, Network Operations Manager	Update for compliance with the Sixth Report and Order

This response is submitted on behalf of Foothills Rural Telephone Cooperative, an incumbent local exchange carrier, and its wholly owned subsidiary, Cellular Services, LLC, a provider of competitive local exchange services. Each company serves rural communities in the state of Kentucky and share operations, including their respective Robocall Mitigation Plans, and will be referred to as “Foothills” throughout this document.

I. Implementation and Extension Status

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

Foothills is eligible 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 network §64.6304(d).

Foothills is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as Foothills’ third-party representative on the ATIS Non-IP taskforce working group

Status of STIR/SHAKEN Implementation

Foothills has implemented authentication and verification of its traffic using the Metaswitch Call Guardian QCall STIR/SHAKEN Signing service for traffic that originates and terminates on the IP portions of the company’s network that support SIP calls.

II. Robocall Mitigation Plan

Foothills is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. Foothills uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which Foothills are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Analytics

Foothills has deployed the Metaswitch Call Guardian Authentication Hub that provides detailed live analysis and reporting on outbound traffic to identify potential illegal robocalling by detecting and flagging for review, suspicious calling patterns. The program includes a reputation monitoring feature that allows Foothills to monitor specific numbers for changes in utilization patterns that may indicate illegal robocalling.

Know Your Customer

Foothills also utilizes the mitigation technique of “Know Your Customer.” Foothills is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Foothills has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

Foothills has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A Foothills representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

Foothills provides a subscription-based, non-commercial legal robocalling product and we educate any subscribers or potential subscribers (such churches, school systems) regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product.

Foothills serves a small number of long-time business end users with large volume calling capability who are being directly contacted to review with them Foothills’ policies and efforts to prevent the Foothills network from being used for illegal robocalling.

III. Traceback and Enforcement Cooperation

Foothills will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). Foothills commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither Foothills nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.