

Leaco ROBOCALL MITIGATION PLAN

Leaco Rural Telephone Coop Inc. is a small/rural carrier eligible for the continuing extension of the STIR SHAKEN implementation deadline on non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Consistent with § 64.6303 (a)(1), Leaco 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. However, Leaco 's non-IP network is connected to carriers that do not support IP connectivity; therefore, Leaco cannot upgrade those non-IP portions of its network to IP connectivity.

Leaco 's network also has IP-portions which originates calls via SIP connections to other carriers. Leaco has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Leaco has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network with the Leaco certificate.

Leaco Rural Telephone Coop Inc. has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Leaco Rural Telephone Coop Inc.'s network are subject to the described robocall mitigation program.

Leaco Rural Telephone Co-op Inc. has contracted with TNS to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Leaco Rural Telephone Co-op Inc. has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Leaco Rural Telephone Co-op can also view reputation changes associated with any of its numbers. Leaco Rural Telephone Co-op Inc. will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Traceback

Leaco Rural Telephone Coop Inc. is committed 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. Leaco will respond to traceback requests within twenty-four (24) hours.

Customer Vetting

Leaco Rural Telephone Coop Inc. has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Leaco Rural Telephone Coop Inc. thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Enforcement

If it is determined a Leaco Rural Telephone Coop Inc. customer is originating prohibited unlawful robocalls on our network, Leaco Rural Telephone Coop Inc. will either warn the customer to stop or terminate their service as allowed per Leaco Rural Telephone Coop Inc.'s policies that define the circumstances by which Leaco Rural Telephone Coop Inc. will suspend or terminate service to a customer. The policies can be viewed here: [**https://leaco.net/legal**](https://leaco.net/legal)

Upstream Provider Knowledge

Leaco knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using Leaco's network to carry or process a high volume of illegal traffic. Leaco 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 Leaco's network. In addition, Leaco is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Customer Education

Leaco Rural Telephone Coop Inc. posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity.

[**https://reportarobocall.com/trf/**](https://reportarobocall.com/trf/)