

Southern California Telephone Company Robo Call Mitigation Plan

SCTC uses the following services and tools to mitigate and investigate inbound and originating ROBOCALLS to and from our subscriber base.

1. Inbound carrier: All calls to our inbound customers are passed through our carrier BULKVS for inbound CNAM. All inbound calls are analyzed by BULKVS software and tagged as SPAM or ROBOCALL so that the end user is notified before arriving to our phone system.
2. Outbound calls pass through our primary SIP Trunk with ANI Networks where they implement STIR/SHAKEN and attest our calls as legitimate. SCTC is notified by our outbound carrier, ANI Networks, of any mass calling events for both domestic and international calls and has the autonomous ability to shut down these paths if they deem them compromised.
3. SCTC uses the software called 'VOIP MONITOR' which allows for the monitoring of live calls and the ability to analyze each event as to its originating IP and destination IP.
4. As a company, SCTC can create detailed CDR reports going back as far as three months.
5. As an owner and operator of our own UaaS Telecom Switch, we have implemented rules and policies in our firewall so that only traffic from our inbound carrier is allowed to our hosted system, and outbound calls are only allowed to our outbound carrier, ANI Networks. This eliminates 'Ghost calls' and unwanted 5060 traffic as well.
6. As a Public Utility and VoIP Provider, SCTC does not use any third-party VoIP services to deliver calls to or from our customers, which gives us the ability to monitor our traffic without the need of third-party technical support.
7. SCTC interviews before installation and maintains a relationship with all our VoIP clients and is acutely aware of the intended purposes of the calls which will be made by new and existing clients.

Investigative Process:

1. In the event that we receive notification that ROBOCALLS are suspected as being originated from an SCTC customer, SCTC will use the given information in the notification to perform analysis from CDRs and VOIP MONITOR to traceback the origins of these calls.
2. SCTC will determine the origin of the calls and take appropriate action to mitigate the situation.
3. If SCTC determines that more information is needed to conduct proper traceback procedures, SCTC will reply as such.
4. SCTC will update the notification provider with all investigation and traceback results as well as any actions taken.

Every call to our inbound carrier is first passed through our CNAM Carrier, BULK VS, where they query every call and label all spam calls as robots, spam call prevention, or fraud and pass on this info to be seen on display screens.