

Vernon Communications Cooperative - OCN 0966 & 717E

Robocall Mitigation Plan

1. Vernon Communications Cooperative is a small service provider serving fewer than 100,000 voice subscriber lines and therefore qualified for an extension of the STIR/SHAKEN requirement under 47 C.F.R. Section 64.6304(a)(2). Since the Sinch STIR/SHAKEN product does not accept all the originating traffic, we are lacking the necessary facilities to implement STIR/SHAKEN for all traffic. We therefore qualify for an additional extension under 47 C.F.R. Section 64.6304(d).
2. Vernon Communications Cooperative commits to respond to all trace back requests from the Commission, law enforcement and the industry traceback consortium within 24 hours. Vernon Communications Cooperative will cooperate on a timely basis with such entities to investigate and stop any illegal robocallers that use our network to originate calls. If one of Vernon Communications Cooperative's customers determines that their number has been spoofed and reports it to our staff, Vernon Communications Cooperative will initiate a traceback request with the industry traceback consortium.
3. Vernon Communications Cooperative has taken the following steps to detect and avoid originating illegal robocalling traffic on our network as part of our Robocall Mitigation Program.
 - a. As a rural provider of voice services, the number of upstream providers used by the Provider to receive and deliver its originated voice calls for termination are somewhat limited. The Provider has longstanding relationships with these upstream providers and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. Further, the Provider, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls.
 - b. Vernon Communications Cooperative will use software provided by TransNexus (a third party analytic vendor), which we have a long standing relationship, to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.
 - c. (1) Vernon Communications Cooperative will 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>
(2) Vernon Communications Cooperative will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.

- (3) If a new or existing customer orders more than five service lines, they will be contacted to determine the intended use of the service. If it is determined that the services will be used for illegal robocalls, we will refuse to initiate the services. If it is determined that the lines are needed for legitimate calls, we will install the additional service lines and put them on a “watch list” in case their business model changes.
- (4) Vernon Communications Cooperative has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Vernon Communications Cooperative will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Vernon Communications Cooperative will contact the customer within 24 hours of such deviations to determine if call volumes are legitimate.
- 4. Vernon Communications Cooperative is not a foreign voice provider.
- 5. Vernon Communications Cooperative has not 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.
- 6. Vernon Communications Cooperative has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.