

Robocall Mitigation Plan (RMP)

SRT Communications, Inc.

This document provides details on SRT Communications' (SRT) robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

SRT, Operating Company Number 3303, 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).

SRT provides local service to under 14,000 customers, fewer than 100,000 voice subscriber lines.

SRT's non-IP network is connected to carriers that do not support IP connectivity; therefore, SRT cannot upgrade the Non-IP connections to IP connectivity. To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), SRT is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as SRT'S third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

SRT also originates calls via SIP connections within its network. SRT is registered with the STI-PA as an authorized service provider in the STIR SHAKEN ecosystem. SRT has implemented the STIR/SHAKEN authentication framework on the IP portion of its network and calls it originates on that portion of its network are compliant. SRT signs all IP originating calls on its network with the SRT certificate.

Principals, Affiliates, Subsidiaries and Parent Companies

Parent, Principals, Affiliates and Subsidiaries of SRT Communications, Inc, the filing entity. North Dakota Network Company (NDNC) is a subsidiary of SRT ILEC, the filing entity. SRT owns 100% of NDNC. Cassidy Hjelmstad is the CEO of SRT and has Managing Control of all subsidiaries.

Robocall Mitigation Plan

All voice traffic that originates on SRT's network is subject to the following Robocall Mitigation Plan designed to mitigate illegal and illegitimate robocalls.

Real-time Controls and Configurations

SRT blocks all unassigned, unallocated, and unused numbers assigned to SRT Communications. In addition, malformed or numbers not compliant with the North American Numbering Plan are blocked from originating on the network. SRT requires all calling parties to provide caller ID numbers that have been verified as owned Direct Number (DN) or the entity has communicated a legitimate right to use.

SRT Call Analytics utilizes a third-party service, TNSI's Negative Reputation Telephone Number Monitoring, to identify calling pattern irregularities for further investigation of potential robocall violations.

Monitoring and Service Performance

SRT actively monitors all customer TDM Primary Rate Interface (PRI) and customer Session Initiated Protocol (SIP) trunks and reports on all traffic. High channel utilization and high calls per minute are flagged for review. Reports are generated nightly and reviewed by a Network Operations Center, with escalation to Engineering as necessary, and Business Sales for customer communication if required.

Acceptable Use of SRT's Service

SRT Communications has a telecommunications tariff on file with the North Dakota Public Service Commission which prohibits the use of SRT's service for unlawful purposes and provides limitations on use of voice service for lawful purposes only.

Enforcement

If it is determined an SRT customer is in violation of SRT's acceptable use policy in any part of its network, SRT will either warn the customer to stop such practices or discontinue their service.

Customer Identification and Verification (Know Your Customer Procedures)

SRT requires new subscribers and subscribers who change existing accounts to provide photo identification or other valid identification to verify customers are legitimate and will use SRT services for all legal means. Additionally, personally identifiable questions may be asked to provide additional security on each account.

Business customers are required to provide valid identification of taxation status and corporate structure. Additional security questions may be required to verify each account. Any contracts are executed by an authorized representative of the company.

Upstream Provider Knowledge

SRT knows all carriers from which it receives traffic. SRT has confirmed that all carriers in which SRT exchanges traffic are listed in the Robocall Mitigation Database.

SRT has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

SRT does not directly receive traffic from any foreign originating or intermediate provider. No provider uses SRT's network to carry or process a high volume of illegal traffic.

Reaction and Response (Traceback)

SRT is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from the network. SRT will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within twenty-four (24) hours.