

## **KINSMAN MUTUAL TELEPHONE CO.**

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### **Robocall Mitigation Plan Description for Kinsman Telephone Company**

#### **STIR/SHAKEN Extensions:**

Kinsman Mutual Telephone Company has received the following extension of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the non-IP networks extension (§64.6304(d)).

The company is a small rural provider that subtends an AT&T tandem. The connection to the tandem is provided over TDM trunks, which are incapable of providing STIR/SHAKEN authentication on calls originated over those tandem trunks. The company has no control over the network connections or infrastructure available for connecting to the tandem office. The infrastructure option for connecting is within the control of the tandem provider company.

All originating calls on the Kinsman Mutual Telephone Company network are subject to the Robocall Mitigation Program measures described below.

#### **Trace Back Requests:**

Kinsman Mutual Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls, within 24 hours of notification by such agency.

#### **Robocall Mitigation Measures:**

- 1) Kinsman Mutual Telephone Company is working to provide our customers with a feature that allows the customer to screen calls for potentially unwanted sales and solicitation calls. This feature gives the customers a layer of protection from illegal robocalls.
- 2) Kinsman Mutual Telephone Company is working on portions of the network to generate originating calls over SIP trunks. With these trunks, the originating calls can be monitored for excessive call volumes and measures are in place with our toll provider to screen for illegal robocalls generated by our long-distance customers. When SIP trunks are established, they will be fully Stir/Shaken compliant.
- 3) Kinsman Mutual Telephone Company has worked with our billing vendor to establish monitoring of originating call volumes by our customer base. Originating call records are

summarized from monthly call volume billing reports and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.

**Status of KINSMAN MUTUAL TELEPHONE COMPANY STIR/SHAKEN Implementation:**

As of February 15, 2024, none of the voice traffic that originates or terminates on the network of Kinsman Mutual Telephone Company is authenticated or verified with STIR/SHAKEN. Kinsman Mutual Telephone Company has received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls. Kinsman Mutual Telephone Company will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Kinsman Mutual Telephone Company has the call chain role of being a voice provider with a STIR/SHAKEN implementation obligation serving end-users.

**Kinsman Mutual Telephone Company Affiliates & Principals information:**

Kinsman Mutual Telephone Company has no affiliated companies involved in any of its operations.

The company officers are primarily responsible for the business operation and management of the company. The company officers are the following individuals:

Board Member – Doreen Harlow  
Secretary/Treasurer –Michelle Baudino

**Know Your Customer issues:**

The company has know-your-customer procedures in place to prevent the abuse of the network related to illegal calls before they occur. The company requires customers to provide information on the physical location for service and a contact person for each service that is provisioned. The company also has documentation regarding acceptable use of service and the prohibition of the use of service for any fraudulent activities. The company has the right to suspend service or terminate service for any customer violation of the service terms.

**Third Party Vendors used in call analytics:**

The company does not utilize any third parties for call analytics, at this point in time. At any point where the company employs a third party for the purpose of a call analytics application, the company will file a timely update to this plan document in the Robocall Mitigation Database.

Kinsman Mutual Telephone Company Primary Contact - Robocall related issues:

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