

## **Doylestown Telephone Company Robocall Mitigation Plan**

This document provides details on Doylestown Telephone Company's robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

Doylestown Telephone Company, Operating Company Number 0609, 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).

Doylestown Telephone Company provides local service to 800 customers, fewer than 100,000 voice subscriber lines. All customers are served on the non-IP portions of the network which relies on TDM technology that cannot initiate, maintain, or terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension §64.6303(a)(2), Doylestown Telephone is an active member of the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

### **Robocall Mitigation Plan**

All voice traffic that originates on Doylestown's network is subject to the following Robocall Mitigation Plan.

#### **Reasonable Steps**

Doylestown Telephone monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are analyzed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short time frame
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Doylestown retains the originating and terminating call detail usage records for a minimum of ten years.

#### **Investigation**

Doylestown investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls.

As of this filing Doylestown has not had any originating robocalls detected in its network by the internal analytics. Nor has Doylestown received any complaints from its customers.

### **Enforcement**

If it is determined that a Doylestown customer is in violation of its acceptable use policy in any part of its network, Doylestown will either warn the customer to stop such practices or terminate their service.

### **Know Your Customer**

Doylestown has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Doylestown vets all residential and business customers, validates their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

### **Contractual Provisions with End-users**

All new customers acknowledge a statement on the service application which states users are prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

### **Upstream Provider Knowledge**

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

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

### **Roll In the Call Chain**

Doylestown Telephone is a voice service provider without the STIR/SHAKEN obligation in its Non-IP network because Doylestown's entire network relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

### **Traceback**

Doylestown is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. Doylestown will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within 24 hours.

### **Robocall Mitigation Database Eligibility**

Doylestown has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Doylestown has not been prohibited from filing in the Robocall Mitigation Database (RMD).