



Ogden Telephone Company Robocall Mitigation Plan

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

Ogden Telephone Company, Operating Company Number 0714, is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d). Ogden Telephone Company provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Ogden Telephone Company's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension §64.6303(a)(2), Ogden 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.

Call Analytics Vendor/Internal Traffic Monitoring.

Call Analytics. Sinch provides Analytics Services via Sinch's CNAM service on inbound calls to local and Toll Free TNs. If a call is suspected to be an illegal robocall or spam call, the CNAM information will be replaced with "robocall" or "spam" or similar designation.

Call Treatment. Sinch also provides call treatment within industry standards. Calls that have been identified as potential illegal robocalls or scam calls are sent to a DTMF randomizer where the calling party must enter digits for the call to proceed.

Reasonable Steps

To address the TDM traffic that Sinch is not monitoring Ogden also 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

Ogden retains the originating and terminating call detail usage records for a minimum of 24 months.

Investigation

Ogden investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls. As of this filing Ogden has not had any originating robocalls detected in its network by the internal analytics. Nor has Ogden received any complaints from its customers. Upon any notice or discovery of suspected illegal robocall traffic on our network, Ogden will immediately investigate the traffic.

Enforcement

If the traffic is determined to be illegal robocall traffic, Ogden will immediately take enforcement actions by suspending services until a full investigation is complete and if required a complete termination of the account.

Know Your Customer

Ogden vets identities of new and renewing applicants by collecting information such as names, business address, tax id, incorporation state and photo identification. Ogden will suspend outbound services to a customer if it determines that the customer is using the service for illegal originating robocalling. All new and renewing customers are reminded that it is illegal to falsify caller id for fraudulent purposes when using their assigned telephone number.

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

Ogden knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Ogden has also reviewed the connected carrier's robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Ogden via its call analytics vendor, monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Ogden's network. Ogden does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Ogden's network to carry or process a high volume of illegal traffic. In addition, Ogden is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

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

Traceback

Ogden commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Ogden commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

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

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