

Northern Telephone and Data - OCN 1519

Robocall Mitigation Plan

1. Northern Telephone and Data 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 some IXCs have not ordered IP trunking into the access tandem, a portion of our traffic is lacking the facilities to implement STIR/SHAKEN. We therefore qualify for an additional extension under 47 C.F.R. Section 64.6304(d).
2. Northern Telephone and Data commits to respond to all trace back requests from the Commission, law enforcement and the industry traceback consortium within 24 hours. Northern Telephone and Data 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 Northern Telephone and Data's customers determines that their number has been spoofed and reports it to our staff, Northern Telephone and Data will initiate a traceback request with the industry traceback consortium.
3. Northern Telephone and Data 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. All Northern Telephone and Data outbound traffic will be monitored daily via internal analytics and the MACC Mediation Trending Exception Logic software, a vendor which we have a long standing relationship. Unusual increases in voice network traffic will be investigated to identify the customer generating the traffic. The customer will be contacted to determine the cause of the high volume traffic. If it is determined to be illegal robocalling traffic, steps will be taken to block the illegal robocalls.
 - c. (1) Northern Telephone and Data 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) Northern Telephone and Data 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) Northern Telephone and Data has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Northern Telephone and Data will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Northern Telephone and Data will contact the customer within 24 hours of such deviations to determine if call volumes are legitimate.
4. Northern Telephone and Data is not a foreign voice provider.
 5. Northern Telephone and Data 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. Northern Telephone and Data has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.