

Granite State Telephone Inc

ROBOCALL MITIGATION PLAN

Granite State Telephone, Inc. (GST) is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

GST 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).

GST provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of GST's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), GST is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. GST's non-IP network is connected to carriers that do not support IP connectivity, therefore, GST cannot upgrade its Non-IP network to IP.

GST has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on GST's network are subject to the described robocall mitigation program.

Robocall Mitigation Program

GST does not use a vendor for call analytics service. GST internally monitors its outbound voice traffic to identify patterns consistent with robocalls. If such patterns are discovered, GST attempts to identify the party using its network to originate the calls and verifying that the originating customer is authorized to use the number (is a valid customer). If it is determined a GST customer is originating prohibited unlawful robocalls on our network, GST will either warn the customer to stop or terminate their service as allowed per GST's policy.

Upstream Provider Knowledge

GST knows all the carriers from which it receives traffic and has confirmed all of the carriers are listed in the Robocall Mitigation Database. GST monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering GST's network. In addition, GST is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Know Your Customer

GST has a process in place to confirm the identity of new subscribers as part of an application for service or a new service contract. Confirmation at the time service is established is initial confirmation of identity via a driver's license or photo ID card or a credit check. GST vets new customers and has service agreement terms prohibiting use of TNs for illegal robocall traffic and identifying and enforcing the consequences for using GST TNs for illegal robocall traffic.. Renewing customers are made aware of the use of service terms.

Traceback

As part of GST's robocall mitigation program, GST cooperates with the Federal Communications Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that GST learns are using its service to originate calls. GST commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.