

Scissortail Communications, LLC

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Scissortail Communications, LLC (“Scissortail”) to mitigate and eliminate illegal robocalling. Scissortail has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Scissortail provides long-distance calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Scissortail is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Scissortail Communications, LLC has a master service agreement with their underlying providers and has received written assurances from their officials that it has and will continue to sign calls submitted to Scissortail Communications, LLC and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Scissortail. Scissortail and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes.

Prospects are required to agree to Scissortail’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Scissortail.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Scissortail as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Scissortail is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Scissortail will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Scissortail Support
405-401-4776

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Scissortail immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. As a long-distance reseller, Scissortail does not participate in issuing or monitoring telephone numbers.

International Calling

Scissortail is not currently an international voice services provider. If at any time Scissortail does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, Scissortail must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage.

Scissortail Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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