



Robocall Mitigation Plan Description for SHAWNEE Telephone Company

STIR/SHAKEN Extensions:

SHAWNEE Telephone Company has received the following extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)).

All originating calls on the SHAWNEE TELEPHONE COMPANY network are subject to the Robocall Mitigation Program measures described below.

Trace Back Requests:

SHAWNEE Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls.

Robocall Mitigation Measures:

- 1) SHAWNEE Telephone Company has available a feature that allows the customer to screen calls for potentially unwanted sales and solicitation calls. This feature gives the customers a layer of protection from illegal robocalls.
- 2) SHAWNEE Telephone Company has updated portions of the network to generate originating some calls over SIP trunks. With these trunks, the originating calls can be monitored for excessive call volumes and measures are in place to screen for illegal robocalls generated by our long-distance customers.
- 3) SHAWNEE Telephone Company is working with our billing and switch vendors to establish monitoring of originating call volumes by our customer base. Originating call records are summarized and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.
- 4) SHAWNEE Telephone Company has the capability to monitor originating call volumes by customer line, and we have implemented a call volume trigger if originating call volumes for particular customer lines break a certain threshold during the course of a monitoring period.



Status of SHAWNEE TELEPHONE COMPANY STIR/SHAKEN Implementation:

As of June 30, 2021, none of the voice traffic that originates or terminates on the network of SHAWNEE Telephone Company is authenticated or verified with STIR/SHAKEN.

SHAWNEE Telephone Company has received a small voice service provider's extension under §64.6304(a) of the FCC's rules, which provides the company with a two-year extension of the STIR/SHAKEN implementation deadline, until June 30, 2023.

SHAWNEE Telephone Company has also received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls.

By June 30, 2023, SHAWNEE Telephone Company expects to be authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls. In addition, SHAWNEE Telephone Company will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

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