

Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan

Ellington Telephone Company

Aka McCormack Networks

Aka Ellington Telecom

Executive Summary

The purpose of this Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan (RMP) is to implement best practices, procedures and policies to mitigate or reduce originating illegal traffic (aka robocalls).

Ellington Telephone Company, aka McCormack Networks, aka Ellington Telecom (Ellington) will:

1. 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:
 - a. <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
2. Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
3. Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
 - a. Investigate suspected illegal traffic
 - b. Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - i. Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
4. Prevent any calls being blocked to or from emergency services
5. Implement the following best practices, policies and procedures as part of Ellington's RMP

Point of contact for this RMP:

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Regulatory Background

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on SIP/IP traffic on their networks as well as to implement an RMP on non-SIP/IP traffic (aka TDM traffic) on their network.

The FCC granted a continuing extension for voice service providers with non-IP networks (aka TDM) from implementing STIR/SHAKEN authentication. Below are the rule sections that apply to Ellington:

§ 64.6304 Extension of implementation deadline.

(a) ***Small voice service providers.***

(2) For purposes of this [paragraph \(a\)](#), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).

(d) ***Non-IP Networks.*** Those portions of a voice service provider or gateway provider's network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls are deemed subject to a continuing extension. A voice service provider subject to the foregoing extension shall comply with the requirements of [§ 64.6303\(a\)](#) as to the portion of its network subject to the extension, and a gateway provider subject to the foregoing extension shall comply with the requirements of [§ 64.6303\(b\)](#) as to the portion of its network subject to the extension.

§ 64.6303 Caller ID authentication in non-IP networks.

(a) Except as provided in [§§ 64.6304](#) and [64.6306](#), not later than June 30, 2021, a voice service provider shall either:

(1) Upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework as required in [§ 64.6301](#) throughout its network; or

(2) Maintain and be ready to provide the Commission on request with documented proof that it is participating, either on its own or through a representative, including third party representatives, as a member of a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution, or actively testing such a solution.

Regulatory Background (cont'd)

Basis for Exemption

Ellington is a “small voice service provider” that has approximately 1,550 voice service subscriber lines aggregated over all of the company’s operations. Ellington qualifies for the continuing exemption in §64.6304(d) as a portion of its network remains non-IP. Ellington’s voice network is currently partial IP and partial non-IP for outgoing traffic to the tandem. For the non-IP portion of its network, it is required to comply with the requirements of §64.6303 (a). This non-IP tandem connection carries some of their traffic to the outside world and relies on a technology that cannot originate, carry, process, or terminate SIP calls.

For the IP portion of its network, it has implemented STIR/SHAKEN. The IP traffic flows through the internet terminating in the Sinch IP network.

Meeting §64.6303(a)(2) Obligations

Ellington is a member of the NTCA, USTA, and National Exchange Carrier Association (NECA) which act as its third-party representatives to develop a non-internet Protocol caller identification authentication solution. NTCA, USTA, and NECA are members of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Roll in the Call Chain

Ellington is a voice service provider providing voice service and broadband services to end user customers inside its regulated serving area. Ellington has a partial a STIR/SHAKEN obligation at this time due to having both IP network and non-IP network (see above).

Operating Company Number (OCN)

Ellington's Operating Company Number (OCN) is 1874.

Status of participation in the Robocall Mitigation Database (RMD)

Ellington has not been prohibited from filing in the RMD.

Commission, law enforcement and/or regulatory action or investigation related to spoofing or suspected unlawful robocalls

Ellington has not been involved in any Commission, law enforcement and/or regulatory action related to spoofing or suspected unlawful robocalls. Ellington has not been removed from the RMD and precluded from refiling due to deficiencies needing to be cured. Ellington authorization has not been revoked due to continuing violations of the Commission's robocall mitigation rules.

Prior two years status

In the past two years Ellington has not been the subject of a formal Commission, law enforcement and/or regulatory action or investigation with accompanying findings of actual or suspected wrongdoing due to Ellington transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, related to spoofing or suspected unlawful robocalls.

Know your upstream provider

Ellington verified that all carriers in which it receives traffic are listed in the RMD.

Know your Customer

Ellington takes the following steps to prevent new and existing customers from originating robocalls over its network:

- All of Ellington's subscribers are defined as a "direct" retail consumer or commercial end users located inside its serving areas
 - These subscribers are best defined as residential and small business customers and Ellington:
 - Validates the residential or business customer's identity
 - Validates the physical location which will be the fixed location where service is established
- Ellington currently does not have any commercial VoIP customers; however, if applicable, Ellington will gather the following information as reasonably practical to "Know your Customer":
 - Physical business location
 - Contact person's information
 - State or country of incorporation
 - Federal tax ID number
 - Nature of the customer's business
- Ellington does not offer service currently to wholesale subscribers

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Long Distance Traffic

Additionally, Ellington has implemented the following best practices, policies, and procedures to mitigate unlawful illegal traffic (robocalls):

- 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:
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- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
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- Investigate suspected illegal traffic
 - Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
- Prevent any calls being blocked to or from emergency services
- Nearly all residential and business lines can place only one call at a time
- All residential and business lines are only able to place calls originating from their own phone number
- Businesses with Trunk Hunting, ISDN-PRI or SIP trunk services are allowed to send spoofed numbers for legitimate business needs. This includes a main line number,
- DODs, toll free number, etc.
- Caller ID and Setup are reviewed when the service is installed to verify legitimate caller ID information
- Caller ID records are reviewed periodically to verify legitimate caller ID information
- Only numbers residing in our switch are assigned to residential and business lines
- Investigate any complaints about legitimate calls being blocked
- Call Detail Records (CDRs) are created for all toll calls

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Local and/or EAS Traffic

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- Only numbers residing in our switch are assigned to residential and business lines
- Investigate any complaints about legitimate calls being blocked

Certification of Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan by Officer of the
Company

I, **Molly Heady**, certify that the above information is true and correct to the best of my knowledge. My title is, **Vice President**, and am an officer of the company.