

## **Wilkes Telephone Membership Corporation ROBOCALL MITIGATION PLAN (RMP)**

Pursuant to 47 C.F.R. § 64.6305, **Wilkes Telephone Membership Corporation** and its affiliates submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **Wilkes Telephone Membership Corporation** has in place to mitigate illegal robocalls. **Wilkes Telephone Membership Corporation** May modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

### **Extension Qualification**

**Wilkes Telephone Membership Corporation** and its affiliates are eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as small voice service providers (§64.6304 (a)(2) that have non-IP portions within their networks §64.6304(d).

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

Consistent with § 64.6303 (a)(1), **Wilkes Telephone Membership Corporation** 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. However, **Wilkes Telephone Membership Corporation's** non-IP network is connected to carriers that do not currently support IP connectivity; therefore, Wilkes cannot upgrade those Non-IP portions of its network to IP connectivity.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Wilkes Telephone Membership Corporation is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Wilkes Telephone Membership Corporation's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

### **STIR/SHAKEN Implementation**

**Wilkes Telephone Membership Corporation** has implemented STIR/SHAKEN in the IP portions of its network through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution.

### **Robocall Mitigation Plan**

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network. **Wilkes Telephone Membership Corporation** will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

**Risk Assessment.** Wilkes Telephone Membership Corporation is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Wilkes Telephone Membership Corporation has not received information suggesting that robocalls are originated on its network. Therefore, Wilkes Telephone Membership Corporation does not consider its network at high risk of originating illegal robocalls.

**Wilkes Telephone Membership Corporation - Upstream Provider Knowledge**

Wilkes Telephone Membership Corporation knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using Wilkes Telephone Membership Corporation's network to carry or process a high volume of illegal traffic. Wilkes Telephone Membership Corporation monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering Wilkes Telephone Membership Corporation's network. In addition, Wilkes Telephone Membership Corporation is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

**SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS**

**Customer Due Diligence:** Wilkes Telephone Membership Corporation conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, is incorporation documents. The Company confirms the customer's service address for all customers. In addition, **Wilkes Telephone Membership Corporation:**

- verifies customer's credit history and business reputation prior to providing service.
- verifies customer information when contracts are renewed or services are added.
- verifies the customer's identity and their right to use the telephone number presented on calls.
- has the policies in place that define the circumstances by which it will deny, suspend or terminate service to a customer.

## **Measures to Prevent or Avoid the Origination of Illegal Robocalls: Call Analytics and Call Blocking**

- **Wilkes Telephone Membership Corporation** has in place an enforceable terms of use and/or an acceptable use policy. **Wilkes Telephone Membership Corporation** also has in place policies designed to detect and prevent fraudulent traffic on its network.
- **Wilkes Telephone Membership Corporation** has deployed call authentication, call labeling, and call blocking services provided by TNS.
- **Wilkes Telephone Membership Corporation** uses TNS Call Guardian call analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **Wilkes Telephone Membership Corporation** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, **Wilkes Telephone Membership Corporation** can suspend and/or terminate service to the customer.
- **Wilkes Telephone Membership Corporation** blocks the following types of calls by default:
  - ☒ Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]
  - ☒ Calls from DNO numbers as per FCC Order [2017 Call Blocking Order]

## **Responding to Traceback Requests**

**Wilkes Telephone Membership Corporation** commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. **Wilkes Telephone Membership Corporation** commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

- **Wilkes Telephone Membership Corporation** has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- **Wilkes Telephone Membership Corporation** will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, **Wilkes Telephone Membership Corporation** will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

### **Cooperation with State and Federal Regulators**

**Wilkes Telephone Membership Corporation** will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **Wilkes Telephone Membership Corporation** will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

## Appendix A

### Wilkes Telephone Membership Corporation Affiliates

The below listed companies are all affiliates of Wilkes Telephone Membership Corporation (parent company). Eric Cramer is the President of Wilkes Telephone Membership Corporation and its affiliates. Eric Cramer serves as CEO of Wilkes Telephone Membership Corporation. Eric Cramer has managing control of Wilkes Telephone Membership Corporation and all its affiliates.

| FRN        | Name                                               | DBA (Brand Name) | OCN (if assigned) |
|------------|----------------------------------------------------|------------------|-------------------|
| 0027738798 | Peoples Mutual Telephone Company                   | RiverStreet      | 0244              |
| 0024813461 | Barnardsville Telephone Company                    | RiverStreet      | 0469              |
| 0027980184 | Ellerbe Telephone Company                          | RiverStreet      | 0478              |
| 0024813446 | Saluda Mountain Telephone Company                  | RiverStreet      | 0498              |
| 0024813412 | Service Telephone Company                          | RiverStreet      | 0500              |
| 0001912138 | Tri-County Telephone Membership Corporation        | RiverStreet      | 0505              |
| 0011915014 | Wilkes Communications, Inc.                        | RiverStreet      | 795D              |
| 0025165895 | RiverStreet Communications of North Carolina, Inc. | RiverStreet      | 769H              |
| 0024212839 | RiverStreet Management Services, LLC               |                  | None Assigned     |
| 0028956738 | RiverStreet Wireless of North Carolina, Inc.       | RiverStreet      | None Assigned     |
| 0029244829 | RiverStreet Wireless of Virginia, Inc.             | RiverStreet      | None Assigned     |
| 0003763489 | Tri-County Communications, Inc.                    | RiverStreet      | 351H              |
| 0029767886 | RiverStreet Networks, Inc.                         |                  | None Assigned     |
| 0029265295 | Electronics Service Co. of Hamlet, LLC             | RiverStreet      | None Assigned     |
| 0036414746 | Amelia Telephone Corporation                       | RiverStreet      | 0217              |
| 0036414761 | New Castle Telephone Company                       | RiverStreet      | 3029              |