

Robocall Mitigation Certification Filing

Prepared June 17, 2021

Voice Service Provider Information

Business name(s):	Montrose Mutual Telephone Company, Inc
Primary address:	102 N. Main St.
Other business names in use:	Respond Communications; DMS Cable Systems
All business names previously used:	N/A
Is this a foreign voice service provider (Yes/No)?	No

Point of Contact for Robocall Mitigation

Name:	Justin Gephart
Title:	Network Operations Manager
Department:	Network
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STIR/SHAKEN Extensions

Montrose Mutual Telephone Company, Inc. (MMTC) operates under 2000 voice access lines and is eligible for, and taking the STIR/SHAKEN implementation extension received under 47 CFR § 64.6304.

Robocall Mitigation Plan

Industry involvement in STIR/SHAKEN initiatives and development

MMTC is a wholly owned subsidiary of Wabash Telephone Cooperative, Inc. Wabash Telephone Cooperative, Inc. actively serves on the STI-GA Board of Directors, STI-GA Technical Committee, and is also a member of the NIPCA Committee (ATIS Non-IP Standards)

STIR/SHAKEN Work-in-Progress

MMTC is a wholly owned subsidiary of Wabash Telephone Cooperative, Inc. (Wabash). Some of the voice traffic Wabash originates on their networks is authenticated with STIR/SHAKEN. **Since 2019' Wabash has successfully authenticated over 1.6 million calls on rural live-production voice networks using SHAKEN Out-of-Band technology.** However, while Out-of-Band technology authenticates and verifies calls with the highest reliability, Wabash and MMTC are subject to the extension above and a robocall mitigation plan submission because of resistance from the communications industry, resulting

in no affordable rural IP connectivity, and Out-of-Band technology not being recognized as an industry standard, even though its currently being reliably used in live call production today.

Know Your Customer

MMTC follows and adheres to section three of the “Best Practices for the Implementation of Call Authentication Frameworks” for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

MMTC has official security officers appointed to respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, and will cooperate in investigating and stopping any illegal ROBO caller(s) originating illegal calls on our networks. MMTC commits to responding to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within twenty-four(24) hours .

Policing Call Volumes

MMTC has less than 2000 voice subscribers. Per day, our voice traffic levels and quantities are relatively low and stable in volume and easily monitored for a change in that volume. If a bad actor(s) would begin originating illegal calls on our network of any volume, we would easily detect the change in call volume and immediately investigate those calls to see where they originated from. If we determine that the calls are unlawful, then we either warn them to stop or terminate their service as appropriate. This will help prevent new and old subscribers from using our network from originating Illegal calls.

Do Not Call Registry and ROBO Call Education

On a regular basis, MMTC will notify our subscribers on the benefits and use of the Do Not Call Registry. And how to avoid being victims of scams and deception, and provide frequent ROBO call education through common marketing channels.

Service Agreements Modification

MMTC has modified its service agreements to include the language that MMTC prohibits the use of telephone numbers for illegal purposes. MMTC will enforce our service agreements and report compromised telephone numbers to the FTC and FCC.