

Central Arkansas Telephone Cooperative, Inc

Robocall Mitigation Plan

This robocall mitigation plan is for Central Arkansas Telephone Cooperative, with headquarters at 4036 Highway 7, Bismarck, AR 71929.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

Central Arkansas Telephone Cooperative has not been prohibited from filing a certification in the Robocall Mitigation Database.

Central Arkansas Telephone Cooperative does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Central Arkansas Telephone Cooperative uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We commit to responding within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Upstream Provider Knowledge

We have two upstream providers, which we have had a relationship with for a number of years. Our IP traffic connection is with Inteliquent and our TDM connection is with AT&T. Both providers have a great service reputation and a vested interest in adhering to the Robocall Mitigation rules and regulations. As stated above in the event we determine our providers are attempting to transit unlawful robocalls, they will be notified accordingly.

STIR/SHAKEN

We have registered with the STI-PA using OCN 1697. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

Central Arkansas Telephone Cooperative qualifies for a STIR/SHAKEN implementation extension for calls that rely on non-IP technology - 47 CFR 64.6304(d).

In addition, to meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Central Arkansas Telephone Cooperative 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 Central Arkansas Telephone Cooperative's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

A handwritten signature in black ink, appearing to read 'Larry Frazier', is written over a horizontal line.

Larry Frazier –General Manager / CEO

Central Arkansas Telephone Cooperative, Inc.