

STIR/SHAKEN CERTIFICATION & ROBOCALL MITIGATION PLAN

Union Telephone Company submits this certification and robocall mitigation plan pursuant to 47 C.F.R. § 64.6305.

Union Telephone Company is a voice provider with a STIR/SHAKEN obligation serving end-users.

STIR/SHAKEN Implementation

Union Telephone Company has implemented the STIR/SHAKEN framework on the IP portion of its network through the use of the TNS Call Guardian Authentication Hub.

Union Telephone Company has portions of its network that are non-IP. Accordingly, Union Telephone Company is subject to a continuing extension as set forth in section 64.6304(d) of the Commissions' rules, which is relevant to those "portions of a voice service provider's network that rely on technology that cannot initiate, maintain, and terminate SIP calls." Union Telephone Company is a member of NTCA, which is actively participating in industry efforts to develop a non-IP solution to address illegal robocalls.

Enforcement

All voice traffic that originates on Union Telephone Company's network is subject to the attached Robocall Mitigation Plan.

Union Telephone Company and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigating program.

Union Telephone Company has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Cooperation with State and Federal Regulators

Union Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocalls that use its service to originate unlawful robocalls. Union Telephone will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and cooperate with such entities in investigating and stopping any robocalls that use its service to carry, process, or originate robocalls.

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. The Company 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. Union Telephone Company has deployed call authentication, call labeling, and call blocking services provided by TNS. The Company has made great strides to protect its networks and consumers from harmful calls. Union Telephone Company is pleased to play a role in that improvement and will continue the necessary work to protect its customers.

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

Union Telephone Company blocks the following types of calls by default:

- ☒ Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]
- ☒ Calls from Do Not Originate numbers as per FCC Order [2017 Call Blocking Order]

Union Telephone Company also uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. Call Guardian uses a complex machine-learning algorithm and predictive analytics to identify robocallers, differentiate between wanted and unwanted calls, identify spoofing events, and identify with certainty which calls should be blocked. Data sources used to produce these algorithms come from crowd-sourced feedback, carrier partners, enterprise data, SS7 and SIP origination, 8XX call events CNAM, and the ENUM/LNP VoLTE registry.

If Union Telephone Company has a reasonable basis to believe that a customer is originating illegal robocalls, Union Telephone Company will require the customer to remedy the problem. If effective action is not taken, Union Telephone Company will take action consistent with its Terms and Conditions, which prohibit the use of services for or in connection with any unlawful or harmful use or purposes. Pursuant to its Terms and Conditions, Union Telephone Company may suspend and/or terminate service to the customer.

Know Your Customer: Union Telephone Company conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- Union Telephone Company verifies customer's credit history and business reputation prior to providing service.

- Union Telephone Company verifies customer information when services are added.
- Union Telephone Company verifies the customer's identity and their right to use the telephone number presented on calls.
- Union Telephone Company has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Know Your Upstream Provider: Union Telephone Company takes appropriate steps to know its immediate service providers to ensure that each immediate upstream provider is not using the Company's network to carry or process a high volume of illegal traffic.

- Verification of an Intermediate Carrier via signature is used to validate the identity and for conveying a reference to the credentials of the signer.
- Union Telephone Company verifies that its direct Intermediate Carriers registered in the Commission's Robocall Mitigation Database (RMD). Union Telephone Company does not accept traffic from intermediate carriers who are not in the RMD.
- All calls received from the Intermediate Carrier go through the Call Guardian Platform.

Traceback: Union Telephone Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocalls that use its network to originate robocalls.