

Western Telephone Company - OCN 1502

Robocall Mitigation Plan

1. Western Telephone Company is a small service provider serving fewer than 100,000 voice subscriber lines and therefore qualified for an extension of the STIR/SHAKEN requirement under 47 C.F.R. Section 64.6304(a)(2). Since the Sinch STIR/SHAKEN product does not accept all the originating traffic, we are lacking the necessary facilities to implement STIR/SHAKEN for all traffic. We therefore qualify for an additional extension under 47 C.F.R. Section 64.6304(d).
2. Western Telephone Company commits to respond to all trace back requests from the Commission, law enforcement and the industry traceback consortium within 24 hours. Western Telephone Company will cooperate on a timely basis with such entities to investigate and stop any illegal robocallers that use our network to originate calls. If one of Western Telephone Company's customers determines that their number has been spoofed and reports it to our staff, Western Telephone Company will initiate a traceback request with the industry traceback consortium.
3. Western Telephone Company has taken the following steps to detect and avoid originating illegal robocalling traffic on our network as part of our Robocall Mitigation Program.
 - a. As a rural provider of voice services, the number of upstream providers used by the Provider to receive and deliver its originated voice calls for termination are somewhat limited. The Provider has longstanding relationships with these upstream providers and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. Further, the Provider, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls.
 - b. Western Telephone Company has contracted with Sinch (a third party analytics vendor) which we have had a longstanding relationship with, to utilize their STIR/SHAKEN product for all originating traffic that is delivered to the Sinch tandem.
 - c. All Western Telephone Company outbound traffic not sent to the Sinch tandem will be monitored daily via internal analytics and unusual increases in voice network traffic will be investigated to identify the customer generating the traffic. The customer will be contacted to determine the cause of the high volume traffic. If it is determined to be illegal robocalling traffic, steps will be taken to block the illegal robocalls.
 - d. (1) Western Telephone Company will 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:
<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
(2) Western Telephone Company will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
(3) If a new or existing customer orders more than five service lines, they will be contacted to determine the intended use of the service. If it is determined that the services will be used for illegal robocalls, we will refuse to initiate the services. If it is determined that the lines are needed for legitimate calls, we will install the additional service lines and put them on a "watch list" in case their business model changes.

- (4) Western Telephone Company has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Western Telephone Company will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Western Telephone Company will contact the customer within 24 hours of such deviations to determine if call volumes are legitimate.
4. Western Telephone Company is not a foreign voice provider.
 5. Western Telephone Company has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall mitigation Database certification or mitigation program description.
 6. Western Telephone Company has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.