



Robocall Mitigation Plan Description for Spruce Knob Seneca Rocks Telephone, Inc. November 2024

STIR/SHAKEN Extensions:

Spruce Knob Seneca Rocks Telephone, Inc. (OCN 0257) has received the following extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rule:) the non-IP networks extension (§64.6304(d)).

All originating calls on the Spruce Knob Seneca Rocks Telephone, Inc. network are subject to the Robocall Mitigation Program measures described below.

Database Eligibility:

Spruce Knob Seneca Rocks Telephone, Inc including All officers, employees, or agents of the Company have not been subject to Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Trace Back Requests:

Spruce Knob Seneca Rocks Telephone, Inc. commits to respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are discovered using our service to originate calls.

Know-Your-Upstream-Provider:

Spruce Knob Seneca Rocks Telephone, Inc., knows all the carriers from which it sends or receives traffic. Spruce Knob Seneca Rocks Telephone, Inc. will monitor the status of these carriers within the Robocall Mitigation Database and will not accept traffic from those carriers that are removed. In addition, the filed Programs of these carriers have been reviewed by Spruce Knob Seneca Rocks Telephone, Inc. to understand the specific steps a provider is taking to mitigate illegal robocalls. These steps and others outlined within this Program help mitigate the possibility of immediate upstream providers using Spruce Knob Seneca Rocks Telephone, Inc. to carry or process a high volume of illegal traffic.

Know Your Customer:

Spruce Knob Seneca Rocks Telephone, Inc. has process in place to prevent new & renewing customers from using our network to originate illegal robocalls. Spruce Knob Seneca Rocks Telephone, Inc. thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating a new service or making changes to existing services.

Robocall Mitigation Measures:

- 1) Spruce Knob Seneca Rocks Telephone, Inc. has established with Communications Data Group (CDG) and Inteliquent monitoring of originating call volumes by our customer base. Originating call records are summarized and compared to previous volumes to check for large increases in call volumes that appear unreasonable. If such volume changes are discovered, the company will investigate the change and take appropriate action with the customer.
- 2) Spruce Knob Seneca Rocks Telephone, Inc. has established with CDG and Inteliquent monitoring of originating call volumes by customer line, and if technically possible will implement a call volume trigger if originating call volumes for particular customer lines that break a certain threshold during the course of a monitoring period.
- 3) Spruce Knob Seneca Rocks Telephone, Inc has not partnered with a third-party call analytics service.

Status of SPRUCE KNOB SENECA ROCKS TELEPHONE, INC. STIR/SHAKEN Implementation:

As of May 8, 2023, all voice traffic that originates or terminates on the IP network of Spruce Knob Seneca Rocks Telephone, Inc. is authenticated with Neustar via STI-Token for STIR/SHAKEN compliance.

Spruce Knob Seneca Rocks Telephone, Inc. has also received a non-IP networks extension under §64.6304(d) of the FCC's rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls. In addition, Spruce Knob Seneca Rocks Telephone, Inc. will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Certification and Contact Updates:

As required, Spruce Knob Seneca Rocks Telephone, Inc will submit any necessary updates because of changes to Company certification, identification information, or contact information to the Commission within 10 business days of the change.

Spruce Knob Seneca Rocks Telephone, Inc. Primary Contact Robocall related issues:

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