

K & M Telephone Company

Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by K & M Telephone Company pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, the Provider’s status with respect to STIR-SHAKEN implementation is as follows:

- The Provider has not implemented the STIR/SHAKEN authentication framework on any portion of its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Provider’s service to originate illegal robocalls.

Presently, the Provider relies on the continuing extension from STIR-SHAKEN implementation provided under 47 CFR § 64.6304 (d) which exempts from STIR-SHAKEN Caller ID Authentication those portions of a voice service provider network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP. More specifically, at this time no part of the Provider’s existing network is capable of initiating, maintaining, carrying, processing, or terminating interconnected VoIP calls, with a continued transmission of STIR-SHAKEN attestation data.

II. TRACEBACK REQUESTS

As noted above, the Provider will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback

request received within 24 hours after receiving the same. Within **Appendix A** to this Plan, the Provider identifies a single point of contact for receiving all traceback requests.

As part of its efforts to assist in the successful traceback of illegal robocalls, the Provider will going forward include within its interconnection agreements language requiring traceback cooperation on any voice service calls exchanged. In part, these related contract provisions will specify the need for parties to promptly identify the upstream provider from which a suspected illegal robocall entered its network or the customer of the service from which the call originated.

III. *CUSTOMER VETTING PRACTICES*

- Residential and small business practices
 - The Provider will vet residential and small businesses through normal business practices and obtain billing address, primary residence, and/or business location information.
- Commercial end user practices
 - The Provider will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, and federal tax ID to identify the general characteristics of the customer's business.
 - The Provider also understands the special importance of vetting any wholesale customers it may have. If necessary, the Provider may vet identity information for its wholesale customers by confirming whether the customer is an FCC Form 499-A filer in the FCC Form 499-A Filer database or in the FCC's Intermediate Provider Registry. If the customer is not registered within those databases further investigation is conducted to better understand the nature of the customer's business.
 - The Provider can utilize call detail records to determine typical call volumes and a history from which to identify significant deviations. The Provider, if needed, will seek to determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls, and will attempt to contact any commercial business within 24 hours to determine if the atypical call volumes are legitimate, and keep records of such call volumes pending any traceback requests.

IV. TELEPHONE NUMBER VALIDATION PRACTICES

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). In accordance with industry best practices, the Provider has procedures in place to confirm the calling customer's right to use a telephone number. Specifically, a subscriber of the Provider's services is permitted to use a telephone number as their caller identity if a number is directly managed by the Provider and/or obtained by the Provider via an underlying partner. For single line voice service subscribers as well as multi-line telephone systems, the switching equipment only accept calls from the number or numbers assigned to that subscriber.

V. INTERNATIONAL CALL ORIGINATORS

The Provider is not currently an international voice services provider. If at any time the Provider does sell its services to customers which are international call originators using North American Numbering Plan resources it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

VI. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

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 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. This includes the use of robocall prevention language in any contracts that the Provider may directly have with any upstream provider entities. Included as part of **Appendix A** to this Robocall Mitigation Plan document is a list of the Provider's current, immediate "Upstream Provider(s)" along with contact information for each.

VII. ONGOING ROBOCALL MITIGATION PRACTICES

The Provider monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns consistent with illegal robocalls are detected or the Provider otherwise suspects illegal robocalling or spoofing is taking place on its network, it seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action. The actions taken may include, but are not limited to: initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name; terminating the party's ability to originate, terminate, or route calls on the Provider's network; and providing notice to law enforcement authorities.

VIII. THIRD-PARTY CALL ANALYTICS

The Provider uses third-party call analytics to assist and prevent the origination of illegal robocalls on its network. Included in **Appendix A** is the name of the vendor(s) used along with a description of the call analytics system(s) used to identify and block illegal robocall traffic.

Appendix A

Traceback Request Single Point of Contact:

Name: Tom Magnuson

Title: President/GM

Phone Number: 402-482-5800

Email Address: tom.magnuson@kmtel.net

Upstream Provider Information:

Name of Upstream Provider: Lumen

Nature of Business: Tandem Switch Provider

Network Location of Upstream Provider: Omaha, NE

Name of contact: Wendy Gray

Title: Account Manager

Phone Number: 541-716-6308

Email Address: wendy.gray@lumen.com

Call Analytics Vendor Name and Description of System:

Name of Vendor: RVW, Inc.

Description of the call analytics system

- The Provider utilizes a 3rd party billing and engineering firm to perform call analytics. Call detail records are automatically uploaded from the Provider switch for review twice per day.
- Proprietary software was developed and enhanced to identify statistical anomalies found in the uploaded call records. Call patterns are monitored so that suspicious originating call patterns can be identified.
- High volume and inconsistent traffic patterns are detected.
- Preliminary thresholds of originating calls, call times, and durations are examined and if necessary, forwarded to Provider personnel for further investigation.
- Refinements may be made based upon feedback from previous history, investigations, and/or traceback requests.