

Polar Telecom - Robocall Mitigation Plan

This Robocall Mitigation Plan is for Polar Telecom OCN 3159 providing local exchange services. The company serves rural communities in the state of North Dakota.

Polar Telecom is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Polar Telecom 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 Polar Telecom's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Polar Telecom provides local service to fewer than 100,000 voice subscriber lines. Some customers are served on the non-IP portions of Polar Telecom's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Polar Telecom's non-IP network is connected to carriers that do not support IP connectivity; therefore, Polar Telecom cannot upgrade those Non-IP portions of its network to IP connectivity.

Polar Telecom also originates calls via SIP connections within its network. Polar Telecom has registered with the Policy Administrator (via its Parent Company Polar) and is an authorized service provider in the STIR SHAKEN ecosystem. Polar Telecom has implemented STIR SHAKEN within its IP-network and signs the calls originating on the IP portions of its network.

Robocall Mitigation Plan

All voice traffic that originates on Polar Telecom's network is subject to the following Robocall Mitigation Plan.

General Prohibition Against Illegal Robocalling

Polar Telecom end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call.
- violating any applicable local, state, or federal law; using the Polar Telecom service to engage in or in connection with fraudulent activities.

In addition, the company has updated its TOS to expressly reference the prohibition on robocalling and all current subscribers have received notice of the publication of its updated TOS.

Polar Telecom's end users are notified that Polar Telecom may take action up to suspension or termination of service for violation of the TOS.

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Know Your Customer

Polar Telecom utilizes the mitigation technique of “Know Your Customer.” Polar Telecom is a small, long-established provider that maintains a close relationship with its subscribers. Its customers are generally low volume users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Polar Telecom has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

Polar Telecom has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential.
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business.
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions.
- A Polar Telecom representative may visit the premise of the business to verify the number of users at the location, if appropriate for the volume of calling.

Polar Telecom provides Terminating Call Manager (TCM), a subscription-based, non-commercial legal robocalling product and we educate any subscribers or potential subscribers (such as churches, school systems) regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product.

Network Monitoring

Polar Telecom has deployed Cordell’s Voice Quality Measurement (VQM) software to monitor against suspicious calling activities including high call volumes, excessive short duration calling and high volumes of non-completed calls. Call monitoring is continuous and automated, a report of suspected calls is produced daily for review by designated employees.

Call patterns that are flagged as suspicious are reviewed by a designated employee and are addressed by a combination of implementation of real time monitoring and contacting the customer to review unusual calling patterns. If Polar Telecom cannot satisfactorily resolve the reason for the flagged traffic, or fails to get cooperation from the end user, it will implement on short notice mitigation activities including suspension / reduction / termination of service on a reasonable notice.

Terminating Call Analytics

Polar Telecom has implemented Innovative Systems’ (TCM) terminating call manager across all incoming trunks to monitor incoming traffic to Polar Telecom’s network for illegal robocalls. Their service analyzes and validates calls terminating to Polar Telecom’s network.

Polar Telecom has also implemented Ribbons Reputation Scoring Service. Fraud and Nuisance Scoring – provides one or more reputation scores indicating the likelihood of a call being fraudulent, telemarketing, or a nuisance based on Ribbon-supplied databases, STIR/SHAKEN verification outcomes, in-network fraud insights from Ribbon Analytics, and customer-provided data sources, including allow lists, deny lists, fraud lists, and DO-NOT-ORIGINATE LISTS.

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Upstream Provider Knowledge

Polar Telcom knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Polar Telcom, via its call analytics vendor, monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Polar Telcom's network. No provider is using Polar Telcom's network to carry or process a high volume of illegal traffic. In addition, Polar Telcom is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Traceback and Enforcement Cooperation

Polar Telcom commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Polar Telcom commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.