
Wolverton Telephone Company - Robocall Mitigation Plan

This Robocall Mitigation Plan is for Wolverton Telephone Company North Dakota and Minnesota, OCN 1509(ND) and OCN 1512(MN), providing local exchange services. Each company serves rural communities in the states of North Dakota and Minnesota and share operations, including their respective Robocall Mitigation Plans.

Wolverton Telephone Company 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)), Wolverton Telephone Company 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 Wolverton Telephone Company's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

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

Wolverton Telephone Company also originates calls via SIP connections within its network. Wolverton Telephone Company has registered with the Policy Administrator (via its Parent Company Polar) and is an authorized service provider in the STIR SHAKEN ecosystem. Wolverton Telephone Company 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 Wolverton Telephone Company's network is subject to the following Robocall Mitigation Plan.

General Prohibition Against Illegal Robocalling

Wolverton Telephone Company 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 Wolverton Telephone Company 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.

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

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Know Your Customer

Wolverton Telephone Company utilizes the mitigation technique of “Know Your Customer.” Wolverton Telephone Company 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.

Wolverton Telephone Company 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.

Wolverton Telephone Company 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 Wolverton Telephone Company representative may visit the premise of the business to verify the number of users at the location, if appropriate for the volume of calling.

Wolverton Telephone Company 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

Wolverton Telephone Company 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 Wolverton Telephone Company 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

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

Wolverton Telephone Company 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

Wolverton Telephone Company knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Wolverton Telephone Company, 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 Wolverton Telephone Company's network. No provider is using Wolverton Telephone Company's network to carry or process a high volume of illegal traffic.

In addition, Wolverton Telephone Company is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Traceback and Enforcement Cooperation

Wolverton Telephone Company 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. Wolverton Telephone Company commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.