

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Utility Telecom Group, LLC (“UTG”) submits this updated report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures UTG has in place to mitigate illegal robocalls as of June 30, 2023 and extending to February 26, 2024. UTG may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Identifying Information

Name: Utility Telecom Group, LLC

OCNs: 9262 California, 811D Nevada

National SPID: 9262

Service Provider Type: Small - less than 100,000 voice lines (see current FCC 477/499 filings)

STIR/SHAKEN Implementation

UTG has complied fully with all conditions set forth in the FCC’S 2020 Report and Order as updated mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission’s rules and policies more generally.

UTG has implemented STIR/SHAKEN through use of the Transaction Network Services (“TNS”) Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC’s STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

UTG has implemented this solution in the IP portions of its network by June 30, 2023:

- ☒ Its traffic is fully attested.
- ☐ Its traffic is partially attested.
- ☐ None of its traffic is yet attested, however UTG has implemented the Robocall Mitigation Plan outlined below.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that UTG has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. UTG will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described.

ORIGINATION CONTROL

Single lines on both platforms using any connection protocol can be controlled with regard to the calling party number presented on originated calls (configurable only by UTG personnel) and the number of simultaneous originated calls.

Multiple call lines (connections to a customer telephone system, e.g.) on both platforms using any connection protocol can be controlled with regard to the calling party number presented on originated calls (can be configured to allow calls only from numbers which UTG personnel pre-configure) and the number of simultaneous originated calls.

PSTN calls coming to the UTG network are generally destined for customer lines and do not result in calls leaving the UTG network. Calls which arrive on ISUP trunks are connected to the legacy platform and are subject to very limited participation in robocall mitigation. The legacy platform's software will not be able to recognize any new ISUP-based protocol values from the calling carrier.

Incumbent Local Exchange Carriers (ILECs) AT&T and Frontier in California and Nevada do not offer SIP-based Local Interconnection or Meet-Point trunk service at this time.

ANALYTICS, TRACING, ADMINISTRATION

The TNS Call Guardian Authentication Hub includes call authentication (calls signed with an STI certificate), analytics, scoring and reputation data from automated network collection and manually-submitted customer experiences, and provider-submitted unallocated, unassigned, and Do Not Originate numbers. UTG has access to the TNS robocall mitigation portal services and negative reputation reporting and administration in real time. Automated monitoring of reputation changes is also available.

Robocall analytics are also available for blocking or diverting calls consistent with the FCC "safe harbor" provisions.

Risk Assessment: UTG is a voice service provider offering a variety of voice calling services to non-carrier, small- and medium-sized businesses. Its customers generally do not originate high volume calls and UTG has never received information suggesting that robocalls are originated on its network. Therefore, UTG does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: UTG conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, may review its organizing documents. UTG confirms the customer's service address for all customers.

- UTG verifies customer's credit history and business reputation prior to providing service.
- UTG evaluates the customer's projected usage, based on the customer's industry type, line purpose, and interview information. After service is established, actual usage is compared to projected usage.
- UTG verifies customer information when contracts are renewed or services are added.
- UTG verifies the customer's identity and their right to use the telephone number presented on calls.
- UTG has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- UTG has an enforceable Terms Of Use and/or an Acceptable Use Policy in place. UTG also has in place policies designed to detect and prevent fraudulent traffic on its network.
- UTG uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If UTG has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, UTG can suspend and/or terminate service to the customer.
- UTG blocks the following types of calls by default:
 - ☒ Calls originating from invalid numbers per FCC Order **[2017 Call Blocking Order]**
 - ☒ Calls from DNO numbers as per FCC Order **[2017 Call Blocking Order]**
- UTG also blocks the following types of calls:
 - ☒ Calls placed from customer lines which exceed the configured maximum number of concurrent originations and/or calls placed from customer lines which exceed the configured maximum rate of calls per second.

Responding to Traceback Requests

- UTG has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- UTG will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, UTG will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

UTG will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, UTG will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Cooperation with Industry

- UTG has deployed call authentication, call labeling, and call blocking services as provided by TNS. UTG has made great strides to protect its networks and consumers from harmful calls. UTG is pleased to play a role in that improvement and will continue the necessary work to protect its customers.
- UTG intends to collaborate with its switching platform manufacturer (MetaSwitch Networks) and call authentication solution provider (TNS) on future enhancements of STIR/SHAKEN, particularly with regard to customers and carriers which connect using non-SIP protocols.

Sincerely,

Jason R. Mills
Chief Executive Officer
Utility Telecom Group, LLC