

Hiawatha Broadband Communications Inc. and RS Fiber Cooperative Robocall Mitigation Plan

Pursuant to 47 C.F.R. § 64.6305(a), this document describes the program implemented by Hiawatha Broadband Communications, Inc. and RS Fiber Cooperative (hereafter referred to together as “HBC”) to mitigate robocalling on its network.

HBC completed its transition to an all-IP network in 2023 and has fully implemented STIR/SHAKEN on all traffic originating on its network using its own STIR/SHAKEN certificate. External traffic both inbound and outbound traverses SIP trunks to Inteliquent, Inc. (“Sinch”), which is also registered in the FCC’s Robocall Mitigation Database.

Know-Your-Customer Policies

Subscriber Vetting: HBC vets the identity of its customers when approving an application and entering into an agreement to provide telephone service. As part of this vetting process, HBC either visits the customer’s premises at installation or verifies the new customer in person at its offices. HBC collects the customer’s legal name and address and other contact information as well as nature of the call traffic for of any business customers. Contact person names are confirmed and maintained in HBC’s database. This information enables HBC to validate the identity of potential customers prior to provisioning of service. Service will not be provided if a new customer’s identification cannot be verified.

Contractual Terms: HBC’s terms of service terms of service prohibit the use of its telephone service for fraudulent or unlawful acts or purposes, and permits the company to terminate a customer’s service for violations of its terms.

Use of Call Analytics to Identify and Block Unlawful Traffic

HBC relies its own call analytics to identify and block unlawful robocall traffic, in addition to Sinch’s call analytics as set forth in its Robocall Mitigation Plan on file with the FCC.

HBC has implemented several tools for identifying, preventing, and blocking unlawful robocalls on its network. HBC has deployed: (1) an “Anonymous Call Rejection” tool which enables automatic rejection of incoming calls where the caller’s number is withheld; (2) a “Selective Call Rejection” tool which allows the customer to create and maintain a list of automatically rejected numbers; and (3) a “Selective Call Acceptance” tool that allows the customer to whitelist the numbers they wish to receive calls from and block all other numbers by default.

HBC customers must establish ownership of any numbers to be used in caller ID. Any off switch numbers requested as caller ID are given additional scrutiny and a business case must be presented before the numbers are approved for use. Caller ID cannot be changed by the customer directly, it must be requested through HBC. HBC reviews and monitors traffic on its switch and trunk interfaces for unusual patterns that indicate unlawful robocall activity. HBC also uses quality of service measure tools provided through Sinch to monitor traffic.

Knowledge of Upstream Provider

HBC's sole upstream provider, Sinch, is a well-known, reputable voice service provider that is registered in the FCC's Robocall Mitigation Database. HBC understands from Sinch's mitigation plan that it vets its own upstream providers.

Cooperation with the ITG, Law Enforcement, and Government Agencies

HBC is committed to its role in combating illegal robocalling. HBC will respond fully and within 24 hours to all traceback requests made by law enforcement authorities, the Industry Traceback Group ("ITG"), and government agencies to investigate and address suspected unlawful robocalls originated by HBC customers. HBC will also promptly cooperate with Sinch on traceback requests.

HBC confirms that it will block all calls and traffic within its control that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on the DNO list issued by the ITG.