

Robocall Mitigation Plan

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>) claiming the FCC's extension for the non-IP portion of our network.

Daviess Martin Rural Telephone Corporation has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Daviess Martin Rural Telephone Corporation thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. Daviess Martin Rural Telephone Corporation also requires a photo ID for all new customers requesting voice service.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number, they provided at account setup.

Upstream Provider Knowledge

Daviess Martin Rural Telephone Corporation knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. Daviess Martin Rural Telephone Corporation monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering Daviess Martin Rural Telephone Corporation's network. In addition, Daviess Martin Rural Telephone Corporation is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

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

STIR/SHAKEN Extensions

Daviess Martin Rural Telephone Corporation is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d). Some of the voice traffic we originate as a service provider (not an intermediate provider) on our voice network is authenticated with STIR/SHAKEN.

Daviess Martin Rural Telephone Corporation provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Daviess Martin Rural Telephone Corporation's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), Daviess Martin Rural Telephone Corporation is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. Daviess Martin Rural Telephone Corporation's non-IP network is connected to carriers that do not support IP connectivity; therefore, Daviess Martin Rural Telephone Corporation cannot upgrade its Non-IP network to IP.

Robocall Mitigation Program

We use software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We receive daily reports that we review and investigate within 5 business days to determine if it was an attempt to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.