

Triangle Communication System Inc. ROBOCALL MITIGATION PLAN

Triangle Communication System Inc. (TCS) Operating Company Number (893H & 958H) 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).

TCS provides local service to fewer than 100,000 voice subscriber lines. All 153 customers are able to be served on IP Portions of TCS's network. However, TCS has connections with other carriers that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), TCS is a member of NTCA. NTCA is a participant in the ATIS Non-IP taskforce working group which developed two viable solutions for STIR SHAKEN in TDM. NTCA is serving as TCS's third party representative on the ATIS Non-IP taskforce working group.

Consistent with § 64.6303 (a)(1), TCS 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. TCS has contacted all of its connected carriers and requested to convert the Non-IP connections to IP connections. They have declined our request.

TCS also originates calls via SIP connections within its network. TCS has registered with the Policy Administrator(via its Parent Company Triangle Telephone Cooperative Association Inc.) and is an authorized service provider in the STIR|SHAKEN ecosystem. TCS has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of TCS's network.

TCS has contracted with Ribbon to sign all SIP calls that originate on its network using the TCS certificate. Ribbon has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem.

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

Internal Traffic Monitoring & Analytics

TCS does not contract with a vendor for call analytics services. TCS internally monitors all originating network traffic for suspicious or abnormal call pattern, volume or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Low average call duration
- Low call completion ratios
- Neighbor spoofing patterns
- Purported illegal robocall numbers on lists from the FCC.

Inbound Robocall Mitigation

Investigation

TCS investigates calls identified by internal traffic monitoring as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if TCS has any other reason to suspect illegal robocalling or spoofing is taking place over its network, TCS will work to identify the party that is using our network to originate, route, or terminate such calls.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a TCS customer is using our network to fraudulently spoof calls or to originate illegal robocalls, TCS will either warn the customer to stop such practices or terminate their service as allowed per TCS policy.

Know your Customer

TCS has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. TCS 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.

Upstream Provider Knowledge

TCS knows all the carriers from which it receives traffic. TCS has confirmed that all its connected carriers are listed in the Robocall Mitigation Database. TCS is in communication with the connected carriers to monitor their originating traffic to mitigate illegal robocalls.

TCS internally 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. TCS does not directly receive traffic from any foreign originating or intermediate provider. No provider is using TCS's network to carry or process a high volume of illegal traffic.

Role In the Call Chain

TCS is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network.. TCS is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of TCS's network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

TCS commits to respond to all traceback requests within 24 hours from the Commission, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Robocall Mitigation Database Eligibility

TCS has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

TCS has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

TCS posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.

Principals, Affiliates, Subsidiaries, and Parent Companies

Craig Gates serves as CEO of Triangle Communication System Inc.

Craig Gates has Managing Control of Triangle Communication System Inc. and all its affiliates, subsidiaries and parent company.

Triangle Telephone Cooperative Association Inc. is the parent company of Triangle Communication System Inc., the filing entity.

Central Montana Communications Inc. is a subsidiary of Triangle Telephone Cooperative Association Inc., the parent company.