



United Telephone Mutual Aid Corporation Robocall Mitigation

United Telephone Mutual Aid Corporation (United) - OCN 1636 - is a small/rural carrier 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).

United Telephone Mutual Aid Corporation provides voice service to fewer than 100,000 voice subscriber lines. Most customers are served on the non-IP portions of United's network which relies 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)), United is a member of NTCA. NTCA participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as United's third-party representative on the ATIS Non-IP taskforce working group.

United also originates calls via SIP connections within its network. United has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. United has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of United's network with the company's certificate.

ROBOCALL MITIGATION PLAN

All calls that originate on United's network are subject to the described robocall mitigation plan. United has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

Call Analytics

United blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, known numbers not allocated to a provider and numbers not assigned to a United Telephone Mutual Aid Corporation subscriber or otherwise set aside for outbound call use.

United has contracted with TransNexus to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. United has access to the vendor's portal and receives daily notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. United also receive reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic. United will examine the reports and investigate and identify the source of the calls as unlawful or legitimate. United also uses a product by Cordell (Nex-Tech) called VQM (Voice Quality Manager) to provide call analytics such as repeated, excessive, international, and emergency calls in the network.

Investigation

United investigates calls identified by its analytics vendors as potential illegal robocalls calls or those that have abnormal call volumes, patterns, or activity consistent with illegal robocalls.

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

Enforcement

If it is determined a United Telephone Mutual Aid Corporation customer is originating prohibited unlawful robocalls on our network, United Telephone Mutual Aid Corporation will either warn the customer to stop or terminate their service as allowed per United Telephone Mutual Aid Corporation's policies that define the circumstances by which United Telephone Mutual Aid Corporation will suspend or terminate service to a customer. The policies can be viewed here:

<http://www.utma.com/policies>

Know your Customer

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

All United customers sign a service agreement before new service is activated or existing service is renewed. The service arrangement includes notice that United prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violate of the service terms, the end user's service may be terminated.

Upstream Provider Knowledge

United knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

United has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

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

Role In the Call Chain

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

Traceback

United 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. United will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

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

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

Customer Education

United Telephone Mutual Aid Corporation posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity. The educational material can be viewed here: <http://www.utma.com>

Customer Vetting

United Telephone Mutual Aid Corporation has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. United Telephone Mutual Aid 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.

Principals, Affiliates, Subsidiaries, & Parent Company

Steve Bjornstad is the President of United Telephone Mutual Aid Corporation. Thomas Egan, Chalmer Dettler, Michele Schommer, Lorne Field, Kent Weston, and Tara McFadden serve as board members of United Telephone Mutual Aid Corporation. Steve Swanson serves as GM/CEO, AJ Hensel serves as COO, and Tara Mikkelsen serves as CFO of United Telephone Mutual Aid Corporation.

Turtle Mountain Communications, Inc is a subsidiary of United Telephone Mutual Aid Corporation. United Telephone Mutual Aid Corporation owns 100% of Turtle Mountain Communications, Inc. Steve Swanson serves as the CEO, AJ Hensel serves as COO, and Tara Mikkelsen serves as CFO of Turtle Mountain Communications, Inc.

Dakota Carrier Network is an Affiliate of United Telephone Mutual Aid Corporation, the filing entity. United Telephone Mutual Aid Corporation owns 8.132% of Dakota Carrier Network. Seth Arndorfer serves as the CEO and Steve Swanson serves as a board member of Dakota Carrier Network.

North Dakota Long Distance is an Affiliate of United Telephone Mutual Aid Corporation, the filing entity. United Telephone Mutual Aid Corporation owns 11.11% of North Dakota Long Distance. Steve Swanson serves as a board member of North Dakota Long Distance.

North Plains Utility Contracting is an Affiliate of United Telephone Mutual Aid Corporation, the filing entity. United Telephone Mutual Aid Corporation owns 25% of North Plains Utility Contracting. Bill Scrivener serves as the CEO, and Steve Swanson and Chalmer Dettler serve as board members of North Plains Utility Contracting.

The Phone Company, Inc (T.P.C. Inc) is an Affiliate of United Telephone Mutual Aid Corporation, the filing entity. United Telephone Mutual Aid Corporation owns 40.5% of The Phone Company, Inc (T.P.C. Inc). TeeJay Kurtz serves as the CEO. Steve Bjornstad, Tom Eagan, Lorne Field, and Michele Schommer serve as board members of The Phone Company, Inc (T.P.C. Inc).

Red River Cellular, Inc is an Affiliate of United Telephone Mutual Aid Corporation, the filing entity. United Telephone Mutual Aid Corporation owns 18.5188% of Red River Cellular, Inc. Steve Swanson serves as a board member of Red River Cellular, Inc. Tara Mikkelsen serves as alternate board member of Red River Cellular, Inc.

North Central RSA 2, Inc is an Affiliate of United Telephone Mutual Aid Corporation, the filing entity. United Telephone Mutual Aid Corporation owns 63% of North Central RSA 2, Inc. Steve Swanson serves as a board member of North Central RSA 2, Inc. Tara Mikkelsen serves as alternate board member of North Central RSA 2, Inc.