



Turtle Mountain Communications, Inc. Robocall Mitigation

Turtle Mountain Communications, Inc. (Turtle Mountain) - OCN 1678 - 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).

Turtle Mountain provides voice service to fewer than 100,000 voice subscriber lines. Most customers are served on the non-IP portions of Turtle Mountain'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)), Turtle Mountain 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 Turtle Mountain Communication's third-party representative on the ATIS Non-IP taskforce working group.

Turtle Mountain also originates calls via SIP connections within its network. Turtle Mountain Communications, Inc. has registered with the Policy Administrator (via its affiliate United Telephone Mutual Aid Corporation) and is an authorized service provider in the STIR|SHAKEN ecosystem. Turtle Mountain has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Turtle Mountain's network with the company's certificate.

ROBOCALL MITIGATION PLAN

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

Call Analytics

Turtle Mountain 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 Turtle Mountain subscriber or otherwise set

aside for outbound call use.

Turtle Mountain 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. Turtle Mountain Communications, Inc. 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. Turtle Mountain 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. Turtle Mountain will examine the reports and investigate and identify the source of the calls as unlawful or legitimate. Turtle Mountain 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

Turtle Mountain 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 Turtle Mountain has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Turtle Mountain 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 Turtle Mountain customer is originating prohibited unlawful robocalls on our network, Turtle Mountain will either warn the customer to stop or terminate their service as allowed per Turtle Mountain's policies that define the circumstances by which Turtle Mountain will suspend or terminate service to a customer. The policies can be viewed here: <http://www.utma.com/policies>

Know your Customer

Turtle Mountain has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Turtle Mountain 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 Turtle Mountain customers sign a service agreement before new service is activated or existing service is renewed. The service arrangement includes notice that Turtle Mountain 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

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

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

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

Role In the Call Chain

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

Traceback

Turtle Mountain 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. Turtle Mountain 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

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

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

Customer Education

Turtle Mountain 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

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

United Telephone Mutual Aid Corporation is the parent company of Turtle Mountain Communications, Inc. 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.

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.