

Highland Telephone Cooperative, Inc.

ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Highland Telephone Cooperative (hereafter HTC) submits this updated report on its implementation of the STIR/SHAKEN call authentication framework and its robocall mitigation plan. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures HTC has in place to mitigate illegal robocalls as of January 20, 2025.

HTC is a small voice provider as defined by 47 CFR 64.6304(a)(2) and is covered under the continuing extension as defined in 47 CFR 64.6304(d) for HTC's non-IP traffic.

Except for the exception due to the extension listed above, HTC is compliant with conditions set forth in the FCC's 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

HTC has implemented STIR/SHAKEN on the IP portion of its network through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

HTC has fully implemented this solution in the IP portions of its network as of June 7, 2023.

Robocall Mitigation Plan (RMP)

All voice traffic that originates on HTC's IP portion of their network is subject to the RMP.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Know Your Customer:

HTC conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. HTC confirms the customer's service address for all customers.

- HTC verifies customer's credit history and business reputation prior to providing service.
- HTC verifies customer information when contracts are renewed or services are added.
- HTC verifies the customer's identity and their right to use the telephone number presented on calls.
- HTC has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

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Know Your Upstream Providers:

- HTC knows all the carriers from which it receives call traffic. HTC has also confirmed that each of these carriers is listed in the Robocall Mitigation Database such that we are participating together for the goal of eliminating all Robocall traffic.
- HTC has reviewed the upstream carriers' RMP to ensure that HTC will be working in conjunction with said carriers to mitigate illegal robocalls.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- HTC has in place an enforceable terms of use and/or an acceptable use policy. HTC also has in place policies designed to detect and prevent fraudulent traffic on its network.
- HTC uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If HTC has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, HTC can suspend and/or terminate service to the customer.
- HTC blocks the following types of calls by default:
 - ☒ Calls originating from invalid numbers per FCC Call Blocking Order
 - ☒ Calls from DNO numbers as per FCC Call Blocking Order

Traceback Requests and cooperation with authorities

- HTC has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. HTC has provided the ITG with the contact information and business hours for those individuals.
- HTC will respond fully and within 24 hours to all traceback requests 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.
- If a pattern of questionable activity is detected, HTC will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

HTC has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. HTC is pleased to play a role in that improvement and will continue the necessary work to protect our customers.