



Robocall Mitigation Plan Description for Mutual Telephone Company

1. Mutual Telephone Company Is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

(a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.

(2) For purposes of this paragraph (a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).
2. Mutual Telephone Company commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. Mutual Telephone Company has taken the following specific steps to detect originating robocall traffic:
 - a. Deploy Call Guardian through our Metaswitch
 - i. Call Guardian along with TNS Call Guardian Authentication Hub will analyze every originating and terminating call for real-time robocall detection
 - b. Call Guardian Authentication Hub
 - i. Detects problems as they occur and provides support for Do Not Originate, invalid, unallocated, unassigned, and spoofed numbers.
 - c. Deployed a Session Border Controller utilizing encryption in the call paths and limiting the number of simultaneous call paths per number.
4. Mutual Telephone Company has taken the following steps to prevent illegal originating robocalling traffic:
 - a. Mutual Telephone Company confirms the identity of all their customers by collecting information such as physical location, photo Identification, contact person(s), state or country of incorporation, federal tax ID, and the general nature of the customer's business.
5. Mutual Telephone Company has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
 - a. Any customers who have been reported or identified will be notified immediately. Any customer participating in illegal robocalling activity will be suspended from originating any calls. If the customer fails to respond, the originating and terminating services will be suspended.
6. Mutual Telephone Company will respond within 24 hours of any request.

- Our Locations -

Little River - 365 Main St • Lyons - 125 W Main St • Marquette - 111 N Washington • McPherson - 209 N Main St • Sterling - 107 S Broadway
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