

Robocall Mitigation Program – Hilliary Non-IP Companies

Tatum Telephone Company OCN 2150, Prairieburg Telephone Company, Inc OCN 1275 and Southwest Oklahoma Tel Co OCN 2025 (collectively the Hilliary Non-IP Companies) are eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as small voice service providers (§64.6304 (a)(2) with non-IP portion within its network §64.6304(d).

The Hilliary Non-IP Companies provide local service to fewer than 100,000 voice subscriber lines. All customers are served on a non-IP network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps The Hilliary Non-IP Companies have taken to avoid originating illegal robocall traffic.

1. Customer Inability to Spoof Caller ID: The Hilliary Non-IP Companies' customers are only able to originate calls from a number that identifies in the companies' switches as a number that has been assigned to them. This prevents the customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on the networks.
2. Network Monitoring:

The Hilliary Non-IP Companies does not use call analytics provided by a vendor.

The Hilliary Non-IP Companies 's billing vendors, as well as its underlying long-distance carrier, will notify The Hilliary Non-IP Companies if they observe excessive call volumes or suspicious call patterns originating on a The Hilliary Non-IP Companies' customer line. If The Hilliary Non-IP Companies is notified of such an issue, we will contact the customer to investigate the purpose of the calls. If, upon investigation, it was determined the customer was using their voice service to make illegal robocalls, The Hilliary Non-IP Companies will act quickly to put an end to the unlawful activity, and may suspend or terminate the customer's service as appropriate.

In addition, The Hilliary Non-IP Companies' Network Operations Center (NOC) generates CDR reports to review and identify if suspicious traffic is generated by customers. Also, only originating calls from end users assigned The Hilliary Non-IP Companies' telephone numbers and / or ported into The Hilliary Non-IP Companies are listed in subscriber records to originate traffic. The Hilliary Non-IP Companies only builds translations in the switch for those assigned telephone numbers.

3. Know-Your-Customer Policy: The Hilliary Non-IP Companies 's business customers are small businesses that are physically located in The Hilliary Non-IP Companies service territories. As a result, The Hilliary Non-IP Companies has never received a request for high-volume origination services. However, if The Hilliary Non-IP Companies ever receives such a request, we will thoroughly vet the identity of the requesting entity prior to providing service. In particular, we will collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

4. *Know Your Upstream Provider*

The Hilliary Non-IP Companies know all the carriers from which they receive traffic and have confirmed that all of the carriers are listed in the Robocall Mitigation Database. The Hilliary Non-IP Companies monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering The Hilliary Non-IP Companies' network. In addition, The Hilliary Non-IP Companies are incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

5. *Traceback*

The Hilliary Non-IP Companies commit 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. The Hilliary Non-IP Companies commit to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.