

Westphalia Telephone Company ROBOCALL MITIGATION PLAN

Westphalia Telephone Company is 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). Westphalia Telephone Company provides local service to 336 customers, fewer than 100,000 voice subscriber lines. 336 customers are served on the non-IP portions of Westphalia Telephone Company's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Consistent with § 64.6303 (a)(1), Westphalia is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, our non-IP network is connected to carriers that do not support IP connectivity; therefore, Westphalia cannot upgrade those non-IP portions of its network to IP connectivity.

Robocall Mitigation Plan

All voice traffic that originates on Westphalia Telephone Company's network is subject to the following Robocall Mitigation Plan.

Call Analytics

Westphalia Telephone Company contracts with MACC to determine if data volumes fall outside the company-specific predetermined ranges. This is designed to catch data issues as quickly as possible, so the issues may be addressed, corrected, noted, and/or ignored.

The volume ranges use a standard deviation process analyzing traffic over the preceding 4 months. The average volume is determined using company-specific percentages, and some companies routinely see volume fluctuations. This volume range is applied per MOU and messages by traffic type on originating access and terminating access.

MACC's Quality Control Analysts will provide information back to Westphalia Telephone Company if there is a trending issue.

Additionally, MACC will soon have a report available from the CABS process which identifies high-volume users who have exceeded an established threshold. Additional analysis will be done, and the customer will be contacted.

Westphalia Telephone Company blocks the origination of calls from unassigned telephone numbers out of its assigned NPA-NXX inventory and calls originating from numbers that are not valid NANP numbers. Examples of such invalid numbers include those that use an unassigned area code; that use an abbreviated dialing code, such as 91155 or 411, in place of an area code; that do not contain the requisite number of digits; and that are a single digit repeated, such as 000-000-0000, with the exception of 888-888-8888, which is an assignable number.

Westphalia Telephone Company also offers call blocking services to allow customers to block calls from unwanted telephone numbers.

Inbound Robocall Mitigation

Investigation

Westphalia Telephone Company investigates calls identified by MACC as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

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

-----Check Service Agreement-----Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Westphalia Telephone Company customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Westphalia Telephone Company will either warn the customer to stop such practices or terminate their service as allowed per Westphalia Telephone Company policy.

Know your Customer

Westphalia Telephone Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Westphalia Telephone Company 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. Westphalia Telephone Company also requires a photo ID for all new customers requesting voice service.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number and email address if available. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number and email address if available. To initiate an account change, a customer must verify their identity and authorization prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the phone number they provided at account setup.

Upstream Provider Knowledge

Westphalia Telephone Company knows all the carriers from which it receives traffic.

Westphalia Telephone Company has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

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

Westphalia Telephone Company is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

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

Traceback

Westphalia Telephone Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that we learn are using our service to originate calls. Westphalia Telephone Company 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

Westphalia Telephone Company has not been involved in any recent formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Westphalia Telephone Company has not been prohibited from filing in the Robocall Mitigation Database (RMD).