

DTC COMMUNICATIONS ROBOCALL MITIGATION PLAN

DTC Communications (DTC), Operating Company Number 0562 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).

DTC provides local service to fewer than 100,000 voice subscriber lines and has customers served on the non-IP portions of DTC's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. DTC's non-IP network is connected to carriers that do not support IP connectivity; therefore, DTC cannot upgrade the non-IP connections to IP connectivity.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), DTC is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as DTC's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

The IP portion of DTC's network is STIR SHAKEN compliant. DTC signs the calls originating on the IP portions of the network with its own certificate.

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

Robocall Mitigation Plan

DTC has contracted with TNS to provide robocall analytics and reputation scoring of our network's TDM outbound traffic. TNS' 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. DTC has access to the TNS portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. DTC also receives reports via email alerts if any of its assigned customer telephone numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic. DTC will examine the report and investigate and identify the source of the calls as legitimate or unlawful.

Enforcement

If it is determined that a DTC customer is originating prohibited unlawful robocalls on its network, DTC will either warn the customer to stop or terminate their service as allowed per DTC's policy.

Know Your Customer

DTC has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. DTC thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new services or making changes to existing services.

All DTC customers sign a service agreement / application before a new service is activated or existing service is renewed. The service arrangement/ application includes notice that DTC prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violation of the service terms, the end user's service may be terminated.

Upstream Provider Knowledge

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

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

DTC, via its call analytics vendor, monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified that if the traffic does not cease, the calls may be blocked from entering DTC's network. No provider uses DTC's network to carry or process a high volume of illegal traffic.

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

Traceback

DTC 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. DTC will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully within twenty-four (24) hours.

Customer Education

DTC posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.