



Dickey Rural Telephone Cooperative
PO Box 69
9628 Highway 281
Ellendale, ND 58436

Robocall Mitigation Plan

Type of Extensions Received Under 47 C.F.R. §64.6304:

Dickey Rural Telephone Cooperative (DRN) is a small, rural carrier with fewer than 100,000 access lines and qualifies for the STIR SHAKEN implementation extension.

DRN has customers served on the non-IP portions of DRN's network.

DRN also originates calls via IP in its network. DRN has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. DRN has implemented STIR|SHAKEN within its network and signs the calls originating on the IP portions of the DRN network.

All calls originating on DRN's network are subject to the following Robocall Mitigation Plan:

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

1. Call Analytics: DRN uses software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. The TransNexus system emails us a report daily, and we review each report within 48 hours.
2. Investigation & Enforcement: DRN investigates all suspected illegal robocalls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.
3. Know-Your-Customer Policy: DRN follows the best practices for vetting caller identity described by the NANC Call authentication Trust Anchor Working Group.
(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

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Upstream Provider Knowledge

DRN knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using DRN's network to carry or process a high volume of illegal traffic. DRN 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 and notified that, if the traffic does not cease, the calls may be blocked from entering DRN's network. In addition, DRN is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback: DRN commits to cooperating with the Commission, law enforcement, and the industry traceback consortium pursuant to FCC rule. DRN is committed to investigating and stopping any illegal robocallers that we learn are using our service to originate calls. DRN commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

In addition, DRN will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network - that does not use SIP technology - when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.