



## **St. Paul Cooperative Telephone Association Robocall Mitigation Program**

St. Paul Cooperative Telephone Association (St. Paul) is a small, rural telecommunications service provider located in St. Paul, Oregon. St. Paul serves approximately 380 voice lines.

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

St. Paul has received the following type of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)).

### Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

St. Paul has taken the following steps to avoid originating illegal robocalls:

- 1) St. Paul's billing company, Mid America Computer Corp., monitors the calling patterns on our customer lines, and reports to us any excessive call volume. Were St. Paul to receive a report of excessive call volume on a customer line, it would trigger an investigation to determine the reason.
- 2) St. Paul's customer application contains a service agreement stating that services can be terminated for abuse. St. Paul would not hesitate to terminate a customer's voice service if, upon investigation, we determined it was being used to make illegal robocalls.
- 3) As a very small local telephone company, St. Paul interacts directly with all its customers; we know them very well. St. Paul has very few new installations and hardly any new business customers on a yearly basis. We have never had any issues regarding misuse of our voice services and, with the measures we have in place, it is highly unlikely will have any in the future.

Joel Halter  
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