

South Central Telephone Association

ROBOCALL MITIGATION PLAN

Type of Extension Received Under 47 CFR 64.6304

South Central Telephone Association, dba SCTelcom, is a small carrier with less than 100,000 voice subscriber lines and therefore was exempt from requirements of 47 CFR 64.6301 through June 30 of 2023 per 47 CFR 64.6304.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

SCTelcom has contracted an engineering firm for Robocall Origination Detection Service. The firm will download SCTelcom's CDRs and investigate patterns indicative of originating robocalling. The firm will provide SCTelcom regular reports identifying any detected suspicious call activity. SCTelcom will examine the reports and identify the source of the calls as unlawful or legitimate.

SCTelcom utilizes a software solution in conjunction with TNS - Call Guardian - to provide robocall analytics and reputation scoring of our network's outbound traffic. The software's 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. SCTelcom has access to the reputation portal for identification of any telephone numbers originating suspected illegal robocalls on its network and receives automated notifications.

Enforcement

If SCTelcom's reasonable steps identify suspected robocalling patterns that are confirmed with further investigation, SCTelcom will take appropriate action up to and including suspension or termination of the subscriber's use of the SCTelcom network.

Traceback

SCTelcom will respond to all traceback requests within 24 hours from the FCC, law enforcement and the industry traceback consortium. We will cooperate on a timely basis with such entities to investigate and stop any illegal robocallers that use our network to originate calls. If one of our customers determines that their number has been spoofed and reports it to our staff, we will initiate a traceback request with the industry traceback consortium.

Customer Vetting

SCTelcom vets the identity of its subscribers as part of the application for service process. This includes collecting information such as physical address, tax ID, and the general nature of the customer's intended use of services.

Acceptable Use Policy

SCTelcom's Acceptable Use Policy is published on the company website and details a policy of disconnecting customer voice service if used for illegal robocall activity.