



Robocall Mitigation Plan

HTC Communications (HTCC), Operating Company Number (8960), 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).

HTC Communications, LLC (“HTCC”) has fewer than 100,000 access lines and still has customers served on the non-IP portions of HTC’s network.

HTCC has also contracted with a third-party carrier to provide numbering for assignment to HTCC customers. HTCC and the third-party carrier connect via SIP. The third-party carrier has fully implemented STIR/SHAKEN within its network and signs the originating calls on behalf of HTCC’s customers on the IP network using HTCC’s token.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), HTC 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 HTC’s third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

All voice traffic that originates on HTCC’s network is subject to the following Robocall Mitigation Plan.

Call Analytics & Network Monitoring

HTCC utilizes multiple tools for monitoring and validating both originating and terminating voice traffic within its network. Listed below are the tools used in identifying and investigating suspected illegal robocalls.

- **Equinox Protector** will be used to analyze all of our originating call records. On a high level, Equinox Protector identifies any calling patterns to detect suspicious call activities for our customers along with any mass calling events. If an event is triggered, it will notify our Central Office team to investigate for possible fraud/illegal robocalling. More specifically, the tool enables HTC to:
 - Monitor the network usage.
 - Identify suspicious network activity (based on abnormal call patterns, atypical call activity, hot lists shared among all Equinox clients, and subscriber information)
 - Receive automatic alerts.
 - Distinguish fraud from honest customer usage.
 - Investigate and manage cases dynamically and easily.
 - Resolve cases intelligently with options ranging from automated disabling of the number to configuration changes.
- **Empirix Protocol Analyzer** is used to troubleshoot/analyze the suspect calls and callers and determine if any action needs to be taken to notify the customer.
- **Metaswitch SAS (Service Assurance Server)** is also used to troubleshoot and validate calls once potential robocalls have been identified to authenticate the customers activity.

Enforcement - General Customer Services Tariff

As a local exchange carrier in the state of South Carolina, HTC has to file its general rates, terms, and conditions with the South Carolina Public Service Commission. Pursuant to this requirement, HTC has a General Customer Service Tariff on file with the Public Services Commission and publicly available at the following Commission link: <https://etariff.psc.sc.gov/>

HTCC clearly denotes that services must be used for lawful purposes and that any unlawful use can result in the service being terminated. Specifically, Section 2.4.5 specifies the following:

- The service is furnished subject to the condition that it will not be used for any unlawful purpose. Service will be discontinued, after receiving proper written notice, if any law enforcement agency, acting within its apparent jurisdiction, advises in writing that such service is being used in violation of the law. The Cooperative will refuse to furnish service when it has reasonable grounds to believe that such service will be used in violation of the law. The Cooperative shall in no event be liable for any damage resulting from any action taken or threatened pursuant to this Section.
- The Cooperative may suspend or terminate telephone service to any person(s), firm or corporation who, uses or permits the use of foul, abusive, obscene or profane language over the facilities furnished by the Cooperative, or impersonates, permits impersonation of any other individual with fraudulent or malicious intent, uses or permits their telephone to be used to make calls whether anonymous or otherwise in any manner, which could reasonably be expected to frighten, abuse, torment or harass another or uses the service in such a manner as to interfere in any way with the service of others.

Service Establishment – Know Your Customer

Prior to establishing service with HTCC, both residential and business customers must provide identification to affirm their authority to establish an account with HTCC. Such identification may include, but not be limited to:

- Social Security Number
- Driver's License Information
- Proof of residence
- Physical Business Location
- Incorporation information
- Federal Tax Id

Additionally, prior to service establishment with HTCC, all customers are subject to a credit check to verify credit worthiness with the company and to identify whether or not deposits are required prior to the establishment of service.

Upstream Provider Knowledge

HTCC knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. HTCC has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, HTCC is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

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

Traceback

HTCC affirms that it will respond to all traceback requests from the Commission, civil and criminal law enforcement, and the Consortium pursuant to FCC rule. Additionally, HTCC has designated a primary point of contact to address traceback requests and has also designated its Network Operations Center as a secondary point of contact to address traceback requests after hours, on weekends, or on holidays. Please find those respective points of contact below:

- Primary Point of Contact: Dustin Richardson
Network Operations Supervisor
843-369-8769
Dustin.Richardson@htcinc.net
3480 Hwy 701 North, Conway SC 29526
- Secondary Point of Contact: Network Control Center
843-365-2186
NetworkControlCenter@htcinc.net
3480 Hwy 701 North, Conway SC 29526

HTC affirms that upon receiving a valid TRACEBACK request from a duly authorized party that it will promptly investigate the traffic identified in the notice and either take steps to effectively mitigate the identified traffic or respond to the Commission that the service provider has a reasonable basis for concluding that the identified calls are not illegal. HTC will fully respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within twenty-four (24) hours of receipt of the request. Further, HTC will take steps to effectively mitigate the traffic identified by:

- Investigating and identifying the source of the traffic
- Verifying that the originating customer owns or is authorized to use the Caller ID number.
- Determine whether the Caller ID name sent to a receiving party matches the customer's name of record.
- Terminate the party's ability to originate, route, or terminate calls.
- Notify applicable law enforcement authorities.

HTC Communications, LLC.

Post Office Box 1820 / Conway, South Carolina 29528-1820 / (843) 365-2151 / FAX: (843) 365-1111 / www.htcinc.net