



Robocall Mitigation Plan

This robocall mitigation plan is for Northern Telephone Cooperative, Inc., (NTCI) headquartered at 121 1st St N; Sunburst, MT 59482.

NTCI performs the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

NTCI has not been prohibited from filing a certification in the Robocall Mitigation Database.

NTCI does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

NTCI uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

NTCI follows the Caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that NTCI has an authenticated relationship with the customer. Authenticated information determines whether the customer is subject to any enforcement actions that restrict the type of calling that they may do; for example, if they have been banned from initiating telemarketing calls.

NTCI validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. NTCI uses this information to support the attestation level assigned to calls that NTCI originates for that customer.

Contractual provisions with customers prohibit them from initiating illegal robocalls. If NTCI should find a customer initiating suspicious robocalls, NTCI would warn them to stop. If such traffic continues, the next step would be to terminate their service.

Know Your Upstream Provider

NTCI has a vetting and review process for upstream providers; that is, providers that send NTCI voice traffic that NTCI terminates or transits to other providers.

NTCI confirms that the upstream provider has a certification in the Robocall Mitigation Database and NTCI will not accept voice traffic from an unregistered provider.

NTCI requires that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

NTCI establishes an understanding of the upstream provider's role in the call path for the traffic they will send to NTCI; for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. NTCI uses this information to understand whether NTCI will be obligated to authenticate unsigned traffic that NTCI may receive from them.

Contractual provisions with upstream providers prohibit them from sending NTCI illegal robocalls. If NTCI should find that an upstream provider is sending suspicious robocalls, NTCI would warn them to stop. If such traffic continues, the next step would be to terminate their service.

Traceback

NTCI responds within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. NTCI cooperates fully with such entities in investigating and stopping any illegal robocallers that use NTCI's service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

NTCI uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts NTCI if NTCI processes outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

NTCI performs the same mitigation steps for all outbound calls regardless of NTCI's role in the call chain for a particular call.

NTCI immediately investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If NTCI determines that the traffic was likely unlawful, then NTCI warns them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, the next step would be to terminate their service.

STIR/SHAKEN

NTCI is registered with the STI-PA using OCN 2248. NTCI has its own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) to use when authenticating calls NTCI originates. NTCI has implemented a STIR/SHAKEN solution supplied by TransNexus.