

Robocall Mitigation Program Mid-Rivers Telephone Cooperative, Inc.

Overview of Mid-Rivers and its Robocall Mitigation Plan

Mid-Rivers Telephone Cooperative, Inc. ("Mid-Rivers") is a non-profit cooperative headquartered in Circle, Montana, providing voice services under **Operating Company Numbers (OCNs) 2246 and 7830**. Consistent with the rules and regulations of the Federal Communications Commission ("FCC" or "Commission"), Mid-Rivers provides the following detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls from Mid-Rivers' network ("Robocall Mitigation Plan"). Mid-Rivers also complies with the following practices described in its Robocall Mitigation Plan.

Mid-Rivers' Robocall Mitigation Plan supplements the company's previous filings in the FCC's Robocall Mitigation Database ("RMD") with the additional information required by the Commission's *Sixth Report and Order in the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, and adopted in the *Eighth Report and Order in the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59.

Regulatory Basis for Mid-Rivers' Extension Category

For the benefit of its customers and the public, Mid-Rivers implemented a STIR/SHAKEN compliant solution in the SIP portion of its network in December 2021, well in advance of the small provider extension deadline, as described below.¹ **Per 47 CFR § 64.6304(d), the remaining non-IP portion of the Mid-Rivers network that relies on technology that cannot initiate, maintain, and terminate SIP calls is currently subject to a continuing extension.** Consistent with the FCC's rules, Mid-Rivers is working to develop a non-IP solution through its membership in NTCA.

Mid-Rivers hereby provides required documentation of the specific reasonable steps it is taking to prevent unlawful robocalls from originating on its network, including the expanded Robocall Mitigation Database filing obligations per the *Sixth Report and Order*, and the use of a reasonable do-not-originate (DNO) list per the *Eighth Report and Order*. Mid-Rivers currently complies with its Robocall Mitigation Plan, and all voice traffic that originates on our network is subject to the Robocall Mitigation Plan.

¹ As of June 2021, Mid-Rivers had approximately 19,000 access lines using approximately 21,000 access numbers. As a small rural voice service provider with less than 100,000 subscribers, and in accordance with § 64.6304(a)(2) of the FCC's rules, Mid-Rivers was exempt from the requirements of §64.6301 through June 30, 2023.

Consistent with the FCC's rules,² Mid-Rivers is also submitting the following Exhibits with its Robocall Mitigation Plan:

- **Exhibit A:** list of FRNs, DBA names, or previous business names associated with Mid-Rivers; and
- **Exhibit B:** list of any Principals, Affiliates, Subsidiaries, and Parent Companies of Mid-Rivers.

Mid-Rivers' Robocall Mitigation Plan Complies with Existing FCC Requirements

Mid-Rivers implemented STIR/SHAKEN in the SIP portions of its network as of December 15, 2021. However, approximately 40% of our access lines generating call traffic still rely on TDM trunks to exit our network through intermediate providers. These TDM portions of the network prevent Mid-Rivers from fully implementing STIR/SHAKEN for all our voice traffic at this time. For the non-IP portions of the network, Mid-Rivers' Robocall Mitigation Plan includes policies and procedures that meet the FCC's current obligations for all voice service providers to:

- (1) Respond to traceback requests fully and within 24 hours.
- (2) Take steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission.
- (3) Implement affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls and describe how the company is meeting this obligation.
- (4) Describe any "know-your-upstream-provider" procedures in place designed to mitigate illegal robocalls, including describing any contractual provisions with end-users or upstream providers designed to mitigate illegal robocalls.
- (5) Describe any call analytics system used to identify and block illegal traffic, including whether a third-party vendor is used and the name of the vendor(s).
- (6) Describe the company's role(s) in the call chain and its RMD eligibility.
- (7) Block calls based on a reasonable do-not-originate (DNO) list.

Mid-Rivers' Robocall Mitigation Plan

1. Mid-Rivers Will Respond to Traceback Requests from the Commission, Civil and Criminal Law Enforcement, and the Traceback Consortium.

Mid-Rivers agrees with the Commission that traceback is an essential tool for determining the source of illegal robocalls. Mid-Rivers will respond fully and within 24 hours to all traceback requests from the Commission, civil and

² See Robocall Mitigation Database External Filing Instructions, Version: May 2025, available at: <https://www.fcc.gov/sites/default/files/rmd-instructions.pdf> (last visited December 1, 2025).

criminal law enforcement, and the FCC's designated Traceback Consortium. To facilitate its response, Mid-Rivers has designated individual points of contact to handle traceback requests and has provided a specific robocall contact in its RMD submission. To its knowledge, Mid-Rivers has not received an official traceback request since the establishment of the Traceback Consortium.³

In responding to traceback requests, Mid-Rivers may also employ additional tools at its disposal. For example, Mid-Rivers uses a Metaswitch soft switch for its voice traffic, which enables the identification of the specific customer that originated the call (or calls) from within our network. This tool will better enable Mid-Rivers to respond timely to any traceback request from the Commission, civil and criminal law enforcement, and the Consortium. We will ensure that any such requests are consistent with other legal and regulatory requirements.

The name, title, department, business address, telephone number, and email address of the person within Mid-Rivers responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, is as follows:

Contact Name: Brandon Mayer
Contact Title: Network and Switching Engineer
Contact Department: Central Office
Contact Business Address Street: 105 Seven Mile Dr
Contact City: Glendive
Contact State and Zip Code: MT 59330
Contact Telephone Number: 406-687-7338
Contact Email: VoiceEng@midrivers.coop

2. Mid-Rivers Will Take Steps to Effectively Mitigate Illegal Traffic When Notified by the Commission.

When Mid-Rivers receives notice from the Commission of suspected illegal calls, Mid-Rivers will take steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission through its Enforcement Bureau. First, Mid-Rivers will promptly investigate the traffic in question by immediately communicating with its customer originating the traffic. Mid-Rivers' investigation will also utilize the Metaswitch SAS, which provides call history, and customer inquiries as necessary to further determine whether the traffic is illegal.

³ See e.g., *FCC Report to Congress on Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information*, December 27, 2023, Attachment A (available at: <https://www.fcc.gov/document/fcc-submits-traced-act-annual-report-2023-congress>) (visited December 5, 2025) (listing providers and details regarding their participation in traceback efforts. Mid-Rivers is not identified as being sent a traceback request by the Industry Traceback Group.).

If the traffic is deemed to be illegal, Mid-Rivers will take appropriate measures to mitigate such traffic, including termination of the customer's access. Mid-Rivers will then promptly report the results of its investigation to the Enforcement Bureau, including steps it has taken to effectively mitigate the identified traffic, or an explanation as to why Mid-Rivers has reasonably concluded that the identified calls were not illegal and what steps it took to reach that conclusion.

3. Mid-Rivers has Implemented Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls.

Mid-Rivers has implemented "Know Your Customer" protocols in its onboarding and renewal procedures for our residential and enterprise customers. For our residential customers, the Mid-Rivers application process requires customers to provide their first and last name, social security number (SSN), birth date, a valid current photo ID, mailing and physical address. Mid-Rivers also utilizes the Online Utility Exchange to perform credit checks and identity verifications for new customers as appropriate. Mid-Rivers representatives are also trained to check for any indications of red flag alerts and fraud alerts during this process. Mid-Rivers' Tariff 110 also includes provisions regarding the refusal and discontinuance of Service. This includes a provision for disconnection of services without notice to the customer in the case of fraudulent or illegal use. The Mid-Rivers public-facing website at <https://midrivers.com/telephone/robocall-tips/> also discloses these same terms.

For our enterprise customers (fewer than 10 in the banking and hospital industries), our current agreements for Hosted PBX phone service include a certification by the customer that the service will be used for legal purposes only and will not be used to originate illegal robocalling. The customer must also agree to terms that permit Mid-Rivers to terminate the service at any time without notice if high-volume origination services are abused or if Mid-Rivers' robocall mitigation call analytics suspect such abuse. Mid-Rivers also has agreements in place with both of its outbound SIP Long Distance providers that if any traffic exceeds specific levels, or terminates to high-value blacklisted countries, this traffic will trigger alerts and automatically freeze the designated SIP trunks from allowing calls until Mid-Rivers personnel review and request these trunks to be unfrozen. Mid-Rivers also works directly with our local government and educational entities who utilize mass notification systems to originate calls, providing education and training on legal calling practices and tools for preventing unwanted calls, such as the Reassigned Numbers Database.

4. Mid-Rivers has "know-your-upstream-provider" procedures in place designed to mitigate illegal robocalls.

Mid-Rivers knows all the carriers from which it receives traffic and has confirmed that all connected carriers are listed in the RMD. Mid-Rivers has

incorporated traceback and prohibited traffic language in all recent contractual agreements with carriers.

Mid-Rivers has reviewed our connected carriers' RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Our TDM connected carriers are the major ILEC, wireless and large VoIP carriers, and all are listed in the RMD with accompanying RMPs. Each of these upstream providers state that they are running call analytics and those with IP networks state that they have implemented STIR/SHAKEN.

Mid-Rivers has reviewed "know your upstream" compliance status with its SIP intermediate providers. All are listed in the RMD and have "know your customer" policies in their RMPs, which Mid-Rivers has reviewed for sufficiency. All are established in the industry, Mid-Rivers has agreements in place with each, and Mid-Rivers has longstanding relationships with each. As new SIP Interconnects come online in the future, we will review requestion providers' RMPs and "know your customer" policies as part of our new turn-up review process.

5. Mid-Rivers Utilizes Call Analytics from TNS to Identify and Block Illegal Traffic.

Mid-Rivers actively monitors its network for suspect traffic and illegal robocall activity utilizing call analytics from TNS to identify and block illegal traffic. Dedicated engineering and technical staff monitor the Mid-Rivers voice network throughout the business day, and a third-party dedicated after-hours support center is used for after-hours call-out activity and alarm monitoring and response.

Mid-Rivers' monitoring activities include hardwired and software-based alarm points, call activity, call delivery stats, high-volume VoIP registration, and network performance. Monitored thresholds that can cause alarm triggers include sudden changes of existing call utilization, sudden changes to VoIP registrations, highwater marks based on historical call utilization patterns per individual trunk, and overall system call utilization, congestion per trunk and overall system health. Mid-Rivers maintains and monitors call logs that show the number and length of calls traveling over its SIP and TDM trunks, and periodically reviews this data for any anomalies that could suggest illegal robocall traffic originating from its network.

If Mid-Rivers discovers through a review of alarms, call logs or traceback of behaviors that any customer is exhibiting unusual calling behavior in originating excessive calls or receives a complaint about a Mid-Rivers customer originating excessive calls, we will contact that customer to determine whether any suspected illegal robocalling is taking place. Mid-Rivers will then take steps as necessary to mitigate the illegal robocalls, to include termination of the customer's service. Mid-Rivers recently commissioned a third-party review of our SIP Provisioning Server and

Session Border Controller (SBC) to aid in identifying potential VoIP security issues.

6. Mid-Rivers is an Incumbent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) and is not prohibited from being listed in the RMD.

Mid-Rivers' role in the call chain is as a small rural ILEC and CLEC voice service provider with a STIR/SHAKEN obligation. Mid-Rivers does not play a role as either a non-gateway intermediate provider, or a gateway provider.

Mid-Rivers is not prohibited from being listed in the RMD and has had no enforcement or regulatory investigations for unlawful robocalling. We have not been prohibited from filing and to our knowledge we have not been involved in any investigations.

7. Mid-Rivers will block calls based on a reasonable do-not-originate (DNO) list.

As a U.S.-based provider in the call path, Mid-Rivers has implemented a reasonable do-not-originate (DNO) list for both its SIP and TDM networks. We utilize the Transaction Network Services (TNS) Universal Call Blocking service for our inbound and outbound call blocking in the SIP/IP portion of our network. We have also implemented the AWARD Consulting DNO service in which AWARD custom built and maintains our Metaswitch DNO configuration, including quarterly updates, at the local switch level for both TDM and SIP calls. The AWARD Consulting fully managed DNO Compliance Service includes licensed access to the Industry Traceback Group (ITG) DNO list and will also block calls that originate from unallocated prefixes (invalid numbers). The new AWARD DNO service has been tested and fully implemented in our Metaswitch as of December 1, 2025.

Additional Components of Mid-Rivers' Robocall Mitigation Plan

Mid-Rivers has Implemented Technical Controls on its Network to Mitigate Illegal Robocalls.

Mid-Rivers previously implemented inbound/terminating robocall mitigation steps by utilizing the Metaswitch TNS Call Guardian service. As of December 15, 2021, Mid-Rivers implemented the Metaswitch MetaSphere QCall STIR/SHAKEN compliant solution for the SIP Inbound and SIP Outbound Long Distance Trunks and setting the Attestation Level on all of our customers. All Mid-Rivers customers (enterprise and residential) are tied to their assigned directory number and can only place calls from directory number(s) that are associated to their build in the switch.

Certain Mid-Rivers enterprise customers, such as banks with multiple branches and locations outside of our service territory, may use telephone numbers that have not been assigned to them by Mid-Rivers. These arrangements require pre-approval from Mid-Rivers after verifying that the customer has the authority to use the numbers. Mid-Rivers also has systems in place to confirm that those numbers are being used in a lawful manner and maintains records for such scenarios.

Outside of such arrangements, our customers (enterprise and residential) can only use numbers that have been assigned to them. IP Access Control Lists (ACLs) have also been implemented to aid in VoIP security measures. Technical controls on the Mid-Rivers TDM network, outbound SIP trunks, and VoIP lines also ensure limits on the allowable number of simultaneous calls.

Mid-Rivers has Instituted Training Programs for its Employees and Customers.

Mid-Rivers network personnel and customer service and business representatives receive annual training regarding this Robocall Mitigation Plan. Mid-Rivers also regularly encourages our customers to use the Do Not Call Registry to help with unwanted calls through an annual bill stuffer, as well as outreach through other channels, including the website, social media, blog posts, or press releases. Mid-Rivers educates its customers on robocalls via these same outreach methods. The Robocall Blocking feature utilizing the TNS Call Guardian service is enabled for all Mid-Rivers landline voice customers by default at no additional charge and works automatically. Customers are notified when they establish new service, and also through our public website at <https://midrivers.com/telephone/robocall-tips/> and <https://midrivers.com/telephone/>, that robocall blocking is enabled and they may contact us at any time if they wish to opt out of this feature. These sites also explain how the service works, and how to report nuisance or fraudulent calls that were not blocked or calls that have been incorrectly blocked or marked as spam. Mid-Rivers will provide a customer, within three business days of their request, a list of blocked calls for the preceding 28 days prior to their request.⁴

Mid-Rivers staff receives regular training and updates on Robocall Mitigation rules and requirements through subscriptions to JSI's Numbering & Porting Essentials (NPE) and Moss Adams Regulatory Compliance services, through our membership in NTCA and our relationship with our legal counsel Wiley, and via other industry resources and publications.

Mid-Rivers is committed to protecting our customers from illegal robocalls by utilizing the most effective resources available that are compatible with our network and financially viable for the cooperative.

⁴ 47 CFR § 64.1200(k)(10).

Exhibit A

List of Mid-Rivers FRNs, DBA Names, and Previous Business Names

<u>Company Name</u>	<u>FRN</u>	<u>DBA Names</u>	<u>Previous Business Names</u>
Mid-Rivers Telephone Cooperative, Inc.	0001646587	Mid-Rivers Communications	Mid-Rivers Telephone, Mid-Rivers Long Distance

Exhibit B

List of Mid-Rivers Principals

<u>Individual Name</u>	<u>Title</u>
Dave Rice	President
Nick Schultz	Vice President
Charlie Ahlgren	Secretary

List of Mid-Rivers Affiliates, Subsidiaries, and Parent Companies

Mid-Rivers does not have any Affiliates, Subsidiaries, or Parent Companies.