

Ben Lomand Rural Telephone Coop., Inc

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Ben Lomand Rural Telephone Coop., Inc. submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **Ben Lomand Rural Telephone Coop., Inc.** has in place to mitigate illegal robocalls. **Ben Lomand Rural Telephone Coop., Inc.** may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Ben Lomand Rural Telephone Coop., Inc., Operating Company Number (0553), 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). To continue to meet the non-IP network criteria for the continuing STIR SHAKEN extension within (§ 64.6303 (a)(2)), Ben Lomand Rural Telephone Coop., Inc, 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 Ben Lomand Rural Telephone Coop., Inc's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Ben Lomand Rural Telephone Coop., Inc provides local service to fewer than 100,000 voice subscriber lines. Most customers are served on the non-IP portions of **Ben Lomand Rural Telephone Coop., Inc's** network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Ben Lomand Rural Telephone Coop., Inc. also originates calls via SIP connections within its network. **Ben Lomand Rural Telephone Coop., Inc.** has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. **Ben Lomand Rural Telephone Coop., Inc.** signs the calls originating on the IP portions of its network with its certificate.

Robocall Mitigation Plan

All voice traffic that originates on **Ben Lomand Rural Telephone Coop., Inc's** network is subject to the following Robocall Mitigation Plan.

Risk Assessment

Ben Lomand Rural Telephone Coop., Inc is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and **Ben Lomand Rural Telephone Coop., Inc** has not received information suggesting that robocalls are originated on its network. Therefore, **Ben Lomand Rural Telephone Coop., Inc** does not consider its network at high risk of originating illegal robocalls.

Call Analytics

Ben Lomand Rural Telephone Coop., Inc uses TNS' Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. **Ben Lomand Rural Telephone Coop., Inc.** blocks the following types of calls by default:

- ☒ Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]
- ☒ Calls from DNO numbers as per FCC Order [2017 Call Blocking Order]

Ben Lomand Rural Telephone Coop., Inc has deployed call authentication, call labeling, and call blocking services provided by TNS.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **Ben Lomand Rural Telephone Coop., Inc.** has an enforceable terms of use and/or an acceptable use policy. **Ben Lomand Rural Telephone Coop., Inc.** also has in place policies designed to detect and prevent fraudulent traffic on its network.
- If **Ben Lomand Rural Telephone Coop., Inc.** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, **Ben Lomand Rural Telephone Coop., Inc.** can suspend and/or terminate service to the customer.

Upstream Provider Knowledge

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

Role In the Call Chain

Ben Lomand Rural Telephone Coop., Inc. is a voice service provider without a STIR/SHAKEN obligation in its non-IP network because the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Ben Lomand Rural Telephone Coop., Inc. has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals or will do so upon receipt of the first request from the ITG.

Ben Lomand Rural Telephone Coop., Inc. will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, Ben Lomand Telephone Co. Inc. will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Ben Lomand Rural Telephone Coop., Inc commits to responding to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within twenty-four(24) hours.

Cooperation with State and Federal Regulators

Ben Lomand Rural Telephone Coop., Inc. will cooperate with state and federal regulators to prevent any and all illegal robocalls.

Specifically, **Ben Lomand Rural Telephone Coop., Inc.** will:

- Respond to valid law enforcement requests
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandatory robocall mitigation procedures

Ben Lomand Rural Telephone Coop., Inc. will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Ben Lomand Rural Telephone Coop., Inc. has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Ben Lomand Rural Telephone Coop., Inc. has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Ben Lomand Rural Telephone Coop., Inc. posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.