

SOUTHEASTERN INDIANA RURAL TEL. COOPERATIVE, INC. ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps that Southeastern Indiana Rural Telephone Cooperative Inc. (SEI) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

SEI 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).

Consistent with § 64.6303 (a)(1), SEI is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, SEI's non-IP network is connected to carriers that do not support IP connectivity; therefore, SEI cannot upgrade those Non-IP portions of its network to IP connectivity.

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

SEI's network also has IP-portions which originates calls via SIP connections to other carriers. SEI has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. SEI has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network with the SEI certificate.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

SEI has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. SEI thoroughly vets new and renewing customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Although SEI's customers generally do not generate a high volume of calls, were SEI to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services. At a minimum, SEI would collect information such as the customer's physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

"Know-Your-Upstream Provider" Procedures

The connections that SEI has with upstream providers have been in place for many years, and we know these companies very well (e.g., Brightspeed, Frontier). However, SEI exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using SEI to carry or process a high volume of illegal traffic. Specifically, SEI collects information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

SEI has contracted with JSI, an engineering firm, for Robocall Origination Detection Service. JSI downloads SEI's call detail records on a monthly basis and looks for patterns indicative of originating robocalling. JSI emails SEI a monthly report identifying any detected suspicious call activity. SEI examines the reports and investigates and identifies the source of the calls as unlawful or legitimate. If it is determined that a SEI customer is originating unlawful robocalls on our network, SEI will either warn the customer to stop or terminate their service as allowed per SEI's policy.

Commitment to Respond to Traceback Requests

SEI commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.