

## **DARIEN TELEPHONE COMPANY ROBOCALL MITIGATION PLAN**

Darien Telephone Company, (Darien) is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2)) that has non-IP portions within its network §64.6304(d).

Darien provides local service to fewer than 100,000 voice subscriber lines. A majority of the customers are served on Darien's IP-network. Darien is registered with the STIR/SHAKEN Policy Administrator and obtained its own SPC token from the Policy Administrator. Darien uses their token to generate a certificate with a Certificate Authority, and authenticates all calls on the IP portions of Darien's network with the Darien certificate.

The portion of Darien's non-IP network is connected to carriers that do not support IP connectivity; therefore, Darien cannot 100% upgrade their network to 100% IP connectivity.

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

### **Robocall Mitigation Plan**

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

#### **Call Analytics**

Darien uses the TransNexus Clear IP product to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Darien has access to the vendor's portal and receives real-time event-based notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Darien also receives alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic.

#### **Investigation**

Darien investigates calls identified by its call analytics provider as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Darien has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Darien will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

### **Enforcement**

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Darien customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Darien will either warn the customer to stop such practices or terminate their service as allowed per Darien policy.

### **Know your Customer**

Darien has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Darien thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

### **Upstream Provider Knowledge**

Darien knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Darien has also reviewed the connected carrier's robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Darien monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Darien's network. No provider is using Darien's network to carry or process a high volume of illegal traffic. In addition, Darien is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

### **Traceback**

Darien commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Darien commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.