

Craw-Kan Telephone Cooperative

Robocall Mitigation Plan

Amended: February 26, 2024

Table of Contents

I.	Robocall Mitigation Plan Introduction	1
A.	Company Summary	1
B.	Identification of STIR/SHAKEN Extension Category	2
II.	Robocall Mitigation Plan.....	3
A.	Craw-Kan Has Implemented Customer Onboarding and Know Your Customer Protocols.....	3
B.	Craw-Kan Has Robust Contractual Terms to Mitigate Origination of Illegal Robocalls	3
C.	Craw-Kan Analyzes and Monitors Its Outbound Network Traffic.....	4
D.	Craw-Kan Investigates Suspicious Calling Patterns.	5
E.	Craw-Kan Is Committed to Participation in the Industry Traceback Group.....	5
F.	Craw-Kan Has Designated an Employee Responsible for Addressing Robocall Mitigation-Related Issues	6
G.	Craw-Kan Conducts Annual Employee Training on its Robocall Mitigation Plan.....	6

I. Robocall Mitigation Plan Introduction

Consistent with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Plan details the policies and practices that Craw-Kan Telephone Cooperative (“Craw-Kan”) has established to prevent unlawful robocalls from originating on its voice network. This Robocall Mitigation Plan provides information on Craw-Kan’s policies and procedures for:

1. Customer onboarding / know your customer (“KYC”);
2. Implementation of robust contractual terms;
3. Analyzing and monitoring outbound network traffic;
4. Investigating suspicious calling;
5. Cooperating in traceback requests;
6. Designating a responsible person responsible for addressing robocall-mitigation-related issues; and
7. Training employees on this Robocall Mitigation Plan.

A. Company Summary

Craw-Kan Telephone Cooperative (“Craw-Kan”) is an incumbent local exchange carrier (“ILEC”) incorporated in the state of Kansas, with its headquarters in Girard, Kansas. Craw-Kan’s address is 200 N Ozark, PO Box 100, Girard KS 66743. Craw-Kan has been in service for 68 years since August 18, 1952, and serves cooperative members from Kansas, Missouri, and Oklahoma. Craw-Kan offers high-speed fiber optic internet, video surveillance, alarm and monitoring, cable TV, and voice service to cooperative members and non-members in its service area. Craw-Kan’s OCNs are 411818 and 421759, and it has no affiliates, subsidiaries, or parent companies. The Craw-Kan principals are listed in Exhibit A to this Robocall Mitigation Plan.

In total Craw-Kan directly provides or resells¹ voice service to approximately 14,700 of its customers across three states: Kansas, Missouri, and Oklahoma. Craw-Kan’s ILEC Voice Service supports approximately 11,215 residential and enterprise customers throughout its

¹ Note that Craw-Kan’s relevant services generally fall into one of two categories: 1) Craw-Kan’s ILEC voice service (the “ILEC Voice Service”); or 2) voice services provided by third-parties that are re-sold by Craw-Kan (the “Resale Voice Services”). While the total number of customers served includes customers of both the ILEC Voice Service and Resale Voice Services, consistent with the Commission’s finding that its STIR/SHAKEN implementation rules “do not apply to providers that lack control of the networks infrastructure necessary to implement STIR/SHAKEN,” this Robocall Mitigation Plan covers only information about Craw-Kan’s ILEC Voice Service. *See* Report and Order, WC Docket No. 17-97, FCC 20-42 at ¶ 40 (March 31, 2020).

territory and its voice service is provisioned over a mix of fiber and TDM networks.² The ILEC Voice Service provisions local voice services to all of these Craw-Kan subscribers. These same subscribers obtain their long-distance service through either Craw-Kan³ (approximately 7,400 subscribers) or other third-party long-distance providers (approximately 810 subscribers). In the latter instance, such long-distance services are routed to the appropriate long-distance provider via Craw-Kan's TDM trunks. Approximately 3,000 of Craw-Kan's voice service subscribers do not obtain long-distance services.

In the prior two years, Craw-Kan (and/or any entity for which it shares common ownership, management, directors, or control) has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

B. Identification of STIR/SHAKEN Extension Category

Craw-Kan is voice service provider with a STIR/SHAKEN implementation obligation directly serving end-users, and it has fully implemented the STIR/SHAKEN authentication framework throughout its network. Craw-Kan is not a foreign voice service provider.

² Craw-Kan provisions its Resale Voice Services to a smaller percentage of its subscribers through a mix of VoIP and wireless services. Regarding the latter, the Resale Voice Services consist of approximately 200 subscribers to mobile lines resold by Craw-Kan from Telispire on the Verizon Network. VoIP offerings provided under the Resale Voice Services are resold by Craw-Kan from Bandwidth.com. There are approximately 3,400 Craw-Kan subscribers utilizing VoIP Resale Voice Services.

³ Craw-Kan subcontracts its long-distance access to Synch for these customers. All these long-distance calls are routed to Synch over Craw-Kan's SIP trunks. Craw-Kan maintains an active list of all these subscriber numbers.

II. Robocall Mitigation Plan

A. Craw-Kan Has Implemented Customer Onboarding and Know Your Customer Protocols.

Craw-Kan has appropriate onboarding and know your customer (“KYC”) protocols in place. For both its residential and enterprise voice services, Craw-Kan has implemented an invoicing system that requires a physical mailing address for any customer subscribing to the ILEC Voice Service. For each account registered in Craw-Kan’s billing system, whether enterprise or residential, customers must provide Craw-Kan accounting staff with: 1) a full legal name associated with the account; 2) a physical mailing address; 3) a valid email address; and 4) a validly assigned phone number. In addition, Craw-Kan has a policy to generally accept payment for services through reputable and verifiable means, for example: 1) check; 2) credit card; and 3) money transfer from a banking account. Craw-Kan’s policy is to not accept payment through other non-traceable means, such as bitcoin, cash, or gift cards.

Finally, with respect to the FCC’s ‘Know Your Upstream Provider’ obligations, Craw-Kan operates with various upstream providers to facilitate all voice traffic originating from or terminating to the Craw-Kan network. The relationship between Craw-Kan and its upstream providers involves strong contractual terms, and the upstream providers are reputable companies that adhere to the requirements put forth by the FCC to mitigate illegal robocalls.

B. Craw-Kan Has Robust Contractual Terms to Mitigate Origination of Illegal Robocalls.

All customers that obtain voice services from Craw-Kan – whether enterprise or residential – are subject to contractual terms contained in all three tariffs filed with the respective state public utility commissions in Kansas, Missouri, and Oklahoma. For each of the referenced tariffs, Craw-Kan has implemented various contractual provisions that can reasonably be expected to significantly reduce the origination of illegal robocalls. These provisions include:⁴

- ***Express Prohibition on Fraudulent Use of the Services.*** Each of the referenced tariffs permit Craw-Kan to refuse to furnish or deny telephone service to any person, firm, or corporation who, over the facilities furnished by Craw-Kan, impersonates or permits others to impersonate any other individual with fraudulent or malicious intent.⁵

⁴ *Call Authentication Trust Anchor*, Second Report and Order, FCC 20-136, WC Docket No. 17-97, ¶ 78 (Oct. 1, 2020).

⁵ Craw-Kan Kansas Tariff, Part 1, Original Sheet 6, Section D.6, p. 6; Craw-Kan Missouri Tariff, Sheet 13, Section D.6, p. 20; Craw-Kan Oklahoma Tariff, p. 10, Section IV(O).

- ***Robust Limitations on the Use of Automatic Dialing and Announcing Devices (“ADAD”)***. Some of the referenced tariffs also include contractual limitations on the use of ADAD by subscribers to any of Craw-Kan’s voice services. Craw-Kan’s Missouri tariff expressly prohibits the connection of an ADAD to Craw-Kan’s telephone network. Although Craw-Kan’s Kansas tariff permits the use of ADAD, such subscribers are subject to the following contractual terms:
 - Prohibition on the use of ADAD to call emergency numbers;
 - Express requirement of prior agreement between the calling and called parties;
 - Express requirement that all attempted calls are terminated and a disconnect or on hook condition created when the call is not completed within thirty (30) seconds;
 - Express requirement that the subscriber utilizing an ADAD notify Craw-Kan in writing at least five (5) days prior to operation with the following information:
 - the prospective user's name, address and telephone number;
 - the address and telephone number from which the ADAD calls are to be made;
 - a description of the ADAD, including whether it is FCC registered;
 - a summary of the nature of the calls to be made;
 - the calendar days and clock hours during which the ADAD is to be used; and
 - an estimate of the expected traffic volume in terms of message attempts per hour and average length of completed message.
 - Craw-Kan can also terminate a subscriber’s service immediately if they fail to comply with the contractual provisions governing use of ADAD.

C. Craw-Kan Analyzes and Monitors Its Outbound Network Traffic.

Craw-Kan’s also has policies and procedures governing the analysis and monitoring of its outbound network traffic. Consistent with Principle #3 of the “Anti-Robocall Principles for Voice Service Providers,”⁶ Craw-Kan analyzes all voice network traffic originating from its network in order to identify and monitor patterns consistent with illegal robocalls. As outlined below, Craw-Kan has policies and procedures in place to analyze and monitor its network on a twenty-four-hour basis.

Craw-Kan maintains a centralized Network Operations Center (“NOC”) staffed by approximately nine full-time employees. The employees generally consist of network engineers

⁶ See State Attorneys General Anti-Robocall Principles, November, 2019 (available at: <https://www.tn.gov/content/dam/tn/attorneygeneral/documents/pr/2019/pr19-32-principles.pdf>) (“Principle #3. Analyze and Monitor Network Traffic. Analyze high-volume voice network traffic to identify and monitor patterns consistent with robocalls.”) (visited June 23, 2021).

and central office technicians. Although their responsibilities include general oversight of the operation of Craw-Kan's voice network, their professional training is ideally suited for analyzing and monitoring outbound network traffic. Craw-Kan operates its NOC Monday through Friday, during regular business hours between 8:00 AM CT and 5:00 PM CT. However, during non-business hours, Craw-Kan designates a single on-call employee responsible for addressing network monitor alarms or problems.

Craw-Kan's analysis and monitoring of its outbound network traffic is further enhanced through deployment of a robust network monitoring tool provide by Metaswitch Networks ("Metaswitch"). Specifically, Craw-Kan has deployed in its network the Metaswitch Call Process Monitor and Transaction Network Services by Metaswitch ("Call Process Monitor"). Call Process Monitor consists of a sophisticated telephony anomaly detection tool that actively monitors and analyzes subscriber traffic in real-time. The Metaswitch Call Process Monitor employs sophisticated real-time active call pattern monitoring techniques that can independently analyze the actions of individual subscribers, automatically detecting and alerting network operators when user activity begins to deviate from a historical norm. Upon detecting suspicious activity on the network, the Metaswitch Call Process Monitor activates an alert that is immediately monitored and addressed by Craw-Kan personnel.

D. Craw-Kan Investigates Suspicious Calling Patterns.

In the rare instance that Craw-Kan identifies suspicious calling patterns, it adheres to certain policies and procedures in order to investigate any suspicious calling patterns. Once Craw-Kan personnel become aware of suspicious calling patterns associated with traffic originating from its network, staff will immediately examine the traffic in question. The investigation will include a determination as to why the traffic has been flagged as suspicious (*e.g.*, high-volumes of calls, low termination rates, etc.), as well as the identity of the underlying subscriber. If Craw-Kan staff determines that the suspicious traffic in question constitutes illegal robocall traffic, Craw-Kan will immediately terminate the subscriber's enterprise or voice service.

E. Craw-Kan Is Committed to Participation in the Industry Traceback Group.

Although Craw-Kan to its knowledge has never received a traceback request, it takes the issue of unwanted and illegal robocalls seriously and is committed to ensuring that its network is not utilized for the origination of such calls. In accordance with its own policies and procedures, and consistent with the FCC's rules and regulations, Craw-Kan will respond fully and within 24-hours to all traceback requests from the Commission, law enforcement, and the industry Traceback Consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

F. Craw-Kan Has Designated an Employee Responsible for Addressing Robocall Mitigation-Related Issues.

The name, title, department, business address, telephone number, and email address of the person within Craw-Kan 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: Bryan McClendon
Contact Title: Network Administrator
Contact Street: 200 N. Ozark
Contact City: Girard
Contact State and Zip Code: Kansas 66743
Contact Telephone Number: (620) 724-8235
Contact Email: bryan.mcclendon@crawkan.net

G. Craw-Kan Conducts Annual Employee Training on its Robocall Mitigation Plan.

Finally, Craw-Kan has also implemented an annual training program to complement this Robocall Mitigation Plan (the “Training Program”). As part of the Training Program, Craw-Kan will educate its employees on Craw-Kan’s: 1) components of its Robocall Mitigation Plan; 2) policies and procedures regarding how Craw-Kan will respond to all traceback requests; and 3) methods and procedures for identifying and responding to suspected illegal robocall traffic originating from its network. Craw-Kan will hold its first annual training in advance of June 30, 2021, and annually thereafter.

* * * *

Exhibit A
List of Craw-Kan Principals

Name	Position
Mary Smith	President
John Lehman	Vice President
Barry Bedene	Secretary
Roger Doue	Board Member
John Kovacic	Board Member
Randy Vogts	Board Member
Sharon Starr	Board Member
Terry Kunstel	Board Member
Wilda Pentola	Board Member
Craig Wilbert	General Manager
Brian Davied	Assistant General Manager