

Sycamore Telephone Company

Robocall Mitigation Plan

Version 2

February 26, 2024

1. Purpose of Robocall Mitigation Plan.

Sycamore Telephone Company ("Sycamore") is dedicated to stopping illegal robocalls calls from originating on its network and to cooperating with the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group.

This document describes its Robocall Mitigation Plan and "reasonable steps" that are being taken to prevent the origination of illegal robocalls prior to the full implementation of STIR/SHAKEN as required by the TRACED Act and FCC rules.

2. Company Information.

Sycamore (OCN 0658) is a small, rural ILEC that serves a study area (SAC 300658) consisting of three small exchanges in northwest Ohio. The company provides voice services to fewer than 2,000 lines, meeting the definition of "small voice service provider" defined in 47 CFR §64.6304(a)(2). Although the central office switch is IP capable, most of Sycamore's operations are dependent upon TDM trunks to other carriers.

3. Roll in the Call Chain

Sycamore is a voice service provider with a STIR/SHAKEN obligation in the IP portion of its network. It still claims exemption for the non-IP portion of its network pursuant to 47 CFR § 64.6304(d). See section 5 of this plan for details of the exemption being claimed.

4. Implementation of STIR/SHAKEN in the IP Portion of its Network.

Effective June 30, 2023, Sycamore implemented STIR/SHAKEN in the IP portion of its network as required by 47 CFR § 64.6304(a). The IP portion of its network transports originating interstate and intrastate non-8YY toll calls for customers that utilize the company's long distance service, STC Long Distance (a registered trade name of Sycamore Telephone Company). All other originating and terminating calls that route via the AT&T Ohio LATA tandem are transported over TDM trunks that are required by AT&T Ohio and are not compatible with current SHAKEN technology. Sycamore is prepared to rapidly implement STIR/SHAKEN for these calls as soon as AT&T Ohio converts from TDM to SIP trunks at its tandem switch. Sycamore is not aware of any plans that AT&T Ohio has for such a conversion and has no control over when or if it will take place.

5. Section 64.6304(d) Extension of Implementation Deadline for Non-IP Networks.

Sycamore claims the continuing exemption for the non-IP portion of its network pursuant to 47 CFR § 64.6304(d), "Those portions of a voice service provider's network that

rely on technology that cannot initiate, maintain, and terminate SIP calls are deemed subject to a continuing extension. A voice service provider subject to the foregoing extension shall comply with the requirements of 47 CFR 64.6303 as to the portion of its network subject to the extension”.

In compliance with Section 64.6303, Sycamore has been and continues to work closely with Com Net Inc., TransNexus, and Ribbon Communications (“Ribbon”) for the implementation of STIR/SHAKEN in both its IP and non-IP networks. Ribbon is a member of the Alliance for Telecommunication Industry Solutions (“ATIS”) and is actively involved in the development of a non-Internet Protocol caller identification solution. TransNexus, although not a member of ATIS, is collaborating closely with them in developing non-IP solutions. Sycamore is also a participant in the National Exchange Carrier Association (“NECA”), which is a member of ATIS and involved in non-Internet Protocol solutions. Sycamore is prepared to conduct testing as needed on any non-IP solutions. Although Sycamore’s network is capable of being 100% IP, it is constrained by AT&T Ohio’s requirement to utilize TDM technology for connection to its tandem switches.

6. Certification Call Origination Procedures

Sycamore certifies that all IP originating calls are subject to STIR/SHAKEN protocols, and all non-IP originating calls are subject to monitoring by TransNexus. See section 11 for details.

7. Participation in Traceback.

Sycamore certifies that it will respond fully, within 24 hours, to all traceback requests from the Federal Communications Commission (“FCC”), law enforcement and the Industry Traceback Group (“ITG”) and will fully cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls. A single point of contact has been established to respond to any requests.

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Sycamore follows the *ITG Policies and Procedures* document, including the *Provider Traceback Best Practices* contained in Appendix A. (This document is available at: <https://tracebacks.org/itg-policies-and-procedures/>).

8. Eligibility to Participate in the Robocall Mitigation Database.

Sycamore certifies that it has not been barred or prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action. It further certifies that the company has not at any time in the prior two years, 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.

9. Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls: Subscriber Vetting (Know Your Customer, Customer Identification and Due Diligence).

Sycamore utilizes the three key components of Know Your Customer (“KYC”) plans required in the financial services industry: Customer Identification, Customer Due Diligence, and Ongoing Monitoring. One benefit of being a small company is that Sycamore employees know all their business customers, their lines of business and normal calling patterns. The employees know most residence customers by name. In addition, the company utilizes *Best Practices for the Implementation of Call Authentication Frameworks* published by the NANC Call Authentication Trust Anchor Working Group. (This document is available at: <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf> and FCC Public Notice DA 20-1526, released December 22, 2020).

Vetting of subscribers, particularly business subscribers that purchase service capable of supporting high call volumes, involves obtaining information such as:

- Legal business name and trade names
- Federal tax ID
- State of Incorporation (only for foreign corporations)
- Nature of the business
- Primary contact person
- Service addresses
- Any authorized telephone numbers that are not provided by Sycamore

If the business were a wholesale customer of Sycamore, additional information would be required such as:

- OCN(s) and proposed use of wholesale services
- FCC Form 499-A Filer ID Number
- FCC Form 499-A filing status
- Robocall Mitigation Plan content and filing status

Vetting of residential and small business customers involves obtaining information such as service address, billing address, primary location, and responsible party as part of normal business practices.

New and renewing customers will be subject to service agreements and acceptable use policies that are designed to mitigate illegal robocalls. Failure to comply with the agreements and policies regarding illegal robocalls may result in service being discontinued.

10. Telephone Number Validation (KYC – Monitoring).

Sycamore manages all telephone numbers that are assigned to it, including any ported-in numbers. Part of managing this inventory includes the identification of active numbers that are assigned to specific customers. This forms the basis for Telephone Number Validation for outgoing calls. The central office switch uses the assigned number information to prevent calls using a telephone number (ANI) that is not assigned to the customer originating the call. This prevents the use of unassigned numbers or numbers assigned to another customer. If the customer has legitimate rights to utilize a telephone number that was not assigned by Sycamore, such as an 8YY number that belongs to the customer's corporate office, proof is required before that specific ANI will be permitted to originate calls. The switch also has the capability to provide statistical reports on originating voice traffic to assist in detecting traffic patterns associated with illegal robocalling.

11. Third-Party Validation and Real-Time Network Monitoring (KYC – Monitoring).

Sycamore utilizes the ClearIP monitoring system from TransNexus that captures call details and provides call analytics, responses, and reports in real-time to process calls on its IP Network. Non-IP calls are also processed by ClearIP during call setup and the originating ANI is checked against several databases to determine if the number is invalid, on a DNO list (Do Not Originate), known robocall number list, etc. This initial screening augments the process described in the Telephone Number Validation section.

The use of call analytics, alerts and reports allows Sycamore to immediately contact the customer to discuss unusual calling, determine if illegal robocalls are involved and provide necessary warnings or terminate the service. The system also produces real-time reports that provide details of all outbound network calling, including date, time, ANI, call volume, duration and other details that will assist in identifying calling patterns and detecting deviations from normal patterns.

12. Know Your Upstream Providers.

Sycamore is a small rural provider of voice service, and the number of upstream providers is limited. Sycamore has longstanding relationships with its upstream providers and maintains an awareness of their nature of business and the legitimacy of their call transmission services. The Robocall Mitigation Database is monitored to ensure that all upstream providers have current mitigation plans and that none have been suspended or revoked by the FCC. Upstream provider Mitigation Plans are reviewed for the details of their actions to mitigate illegal robocalls. Future contractual agreements with upstream providers will include provisions designed to mitigate illegal robocalls. Sycamore will not accept direct traffic from any voice service provider or gateway provider that is not listed in the Robocall Mitigation Database.

13. Accepting Calls from Non-Gateway Intermediate Providers.

Pursuant to the *Sixth Caller ID Authentication Report and Order*, Sycamore will not accept any traffic directly from a non-gateway intermediate provider not listed in the Robocall Mitigation Database, effective May 28, 2024.

14. International Services.

Sycamore does not sell any services to international call originators using NANP number resources.

15. Ongoing Robocall Mitigation.

Sycamore will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market. Currently, Sycamore plans to utilize the TransNexus alternate solution for non-IP traffic if it is compliant with or accepted as the final, industry-wide standard to provide robocall mitigation on any TDM trunk groups until they are converted to IP. This will provide for ongoing robocall mitigation that covers both the IP and non-IP portions of its network.

16. Mitigation Plan Revisions.

Sycamore is committed to update this plan as conditions change and the availability of additional robocall mitigation systems, particularly for TDM traffic, gain industry-wide acceptance. The Robocall Mitigation Database will be updated within ten (10) business days of any substantial changes to the current plan.