

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On Behalf of	Contact/Title	Change Summary
February 14, 2024	Central Utah Telephone Skyline Telecom Bear Lake Communications Central Telcom Services	Shayne Thompson, Voice Manager	Update for compliance with the Sixth Report and Order

This update is submitted on behalf of the companies listed above (“CUTC”). CUTC provides both competitive and incumbent local exchange services in Utah and Nevada. All the companies listed above share management.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

CUTC 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).

CUTC is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as CUTC’s third-party representative on the ATIS Non-IP taskforce working group

Status of STIR/SHAKEN Implementation

CUTC has implemented authentication and verification with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company’s network that support SIP calls using the TransNexus Clear IP Solution.

II. Robocall Mitigation Plan

CUTC is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. CUTC uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which CUTC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Analytics

CUTC has deployed a Ribbon Call History Server to monitor against suspicious calling activities including high call volumes, including excessive short duration calling and high volumes of non-completed calls. Call monitoring is continuous and automated and a report of suspected calls is produced daily for review and potential remediation by designated employees.

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Know Your Customer

CUTC utilizes the mitigation technique of “Know Your Customer.” CUTC is a small, long established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

CUTC has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

CUTC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- An CUTC representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

III. Traceback and Enforcement Cooperation

CUTC will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). CUTC commitments to respond 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.

IV. Additional Certifications

Neither CUTC nor any entity which shares common ownership, management, directors, or control has 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.