

Midstate Telephone Company ROBOCALL MITIGATION PLAN

Midstate Telephone Company (Midstate), Operating Company Number 1617, 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).

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

Midstate provides voice service to fewer than 100,000 voice subscriber lines. Some customers are still served on the non-IP portions of Midstate's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Midstate's non-IP network is connected to carriers that do not support IP connectivity; therefore, Midstate cannot upgrade the Non-IP portions of its network to IP connectivity.

Midstate has contracted with Toly Digital to provide numbering for assignment to some of Midstate's customers. Midstate and Toly Digital connect via SIP. Toly Digital has fully implemented STIR/SHAKEN within its network and signs the originating calls on behalf of Midstate's customers routing on their IP network. Toly Digital has also deployed the Transnexus robocall mitigation solution.

Midstate also originates calls via SIP connections within its network. Midstate has registered with the Policy Administrator(via its Parent Company Reservation Telephone Cooperative) and is an authorized service provider in the STIR|SHAKEN ecosystem. Midstate has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of its network.

Robocall Mitigation Plan

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

Call Analytics

Midstate has contracted with Ribbon for its Call Trust product which provides robocall analytics and reputation scoring of our network's outbound traffic. The vendor uses software to monitor outbound voice traffic in real time and provides detailed reporting identifying if our network originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list,

in the FCC consumer complaint database or has a poor reputation. Midstate has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

Terminating Robocall Mitigation

Midstate uses Innovative Systems' Terminating Call Manager which analyzes and validates the validity of calls terminating to Midstate's network.

Investigation

Midstate investigates calls identified by its analytics vendor potential illegal robocalls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Midstate has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Midstate 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 Midstate customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Midstate will either warn the customer to stop such practices or terminate their service as allowed per Midstate policy.

All Midstate customers receive notice of our company's prohibited use of its network for the initiation of fraudulent spoofing and robocalls. If the customer is found in violate of the prohibited use terms, their service may be terminated.

Know your Customer

Midstate has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Midstate 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.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup. Midstate also requires a photo ID for all new customers requesting voice service.

Upstream Provider Knowledge

Midstate knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Midstate has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, Midstate is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

Midstate is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Midstate is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Midstate 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. Midstate will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Midstate has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Midstate has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Midstate posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.