

Valliant Telephone Company Robocall Mitigation Program

Valliant Telephone Company (Valliant) is a very small telecommunications service provider serving rural communities in southeastern Oklahoma. Valliant serves approximately 790 voice lines, comprised of 517 residential lines and 273 business lines.

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

Valliant has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)).

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps Valliant has taken to avoid originating illegal robocall traffic.

- *Know-Your-Customer Policy*: Valliant vets the identity of its residential and business customers. Valliant requires all potential new customers to physically come to our office to apply for any voice services so that we may screen them. Valliant also obtains from potential business customers their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of their business.
- *Call Detail Record Monitoring*: Valliant maintains call detail records to determine typical call volume for its customers. Were Valliant to observe an unusually high volume of short duration calls being originated by a customer, we would follow up with them to determine the purpose of the calls and whether or not they were lawful.
- *General Terms and Conditions*: Valliant's general terms and conditions state that voice services may only be used for legal purposes and that Valliant reserves the right to terminate service if illegal usage occurs. Valliant would not hesitate to terminate a customer's voice service if, upon investigation, it was determined that they were using the service to make illegal robocalls.
- *Customer Inability to Spoof Caller ID*: When making a phone call, Valliant's customers do not have the ability to alter the caller ID from the actual phone number assigned to them. This prevents the origination of illegally spoofed robocalls on Valliant's network.

Status of STIR/SHAKEN Implementation

As of Feb 6, 2024, all the voice traffic is filtered through TNS connect call guardian. Valliant Telephone company has also implemented an agreement with USAD where USAD will token the calls to USAD with an A attestation using USAD certificate on all ip calls. USAD is Valliant Telephone Companies only sip trunk with ip connectivity.