



Robocall Mitigation Plan

of

The Pioneer Telephone Association, Inc. d/b/a Pioneer Communications

Pioneer Communications (“Pioneer”) is a rural incumbent local exchange carrier serving customers throughout Southwest Kansas. Pioneer’s network originates voice traffic in IP and non-IP formats. Accordingly, some of the voice traffic that originates on Pioneer’s network is signed with *STIR/SHAKEN* technology, and some of Pioneer’s originating voice traffic is not signed with *STIR/SHAKEN*. All voice traffic that originates on Pioneer’s network is subject to Pioneer’s Robocall Mitigation Plan.

EXTENSION OF *STIR/SHAKEN* IMPLEMENTATION FOR NON-IP NETWORK

Pioneer is a voice service provider with a *STIR/SHAKEN* implementation obligation on the IP-Portions of its network. Pursuant to 47 C.F.R. § 64.6304(d), Pioneer has a *STIR/SHAKEN* implementation extension for 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.

Pioneer is committed to implementing a non-IP caller ID authentication framework for voice calls delivered over the non-IP portions of its network when such a framework is fully developed and finalized by industry standards and the necessary equipment and software are available on the commercial market. Pioneer is a carrier-member of NTCA—The Rural Broadband Association, which is participating, as a member of industry standards and working groups that are working to develop a non-IP caller identification authentication solution to prevent the origination of illegal robocalls.

PREVENTING THE ORIGATION OF ILLEGAL ROBOCALLS

Pioneer takes the following steps to prevent the origination of illegal robocall traffic:

Know Your Customer Policy – Pioneer utilizes a know your customer policy to prevent voice services from being used by new and renewing customers to originate illegal robocalls. Pioneer’s policy is based on the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). Pioneer vets the identity of subscribers as part of the application for service process. Pioneer vets the identity of customers as part of the application for service process. For example, Pioneer collects and reviews information related to a residential or business customer’s service location, mailing address, designated contact persons, and persons authorized to make account changes. For business customers, Pioneer also collects and reviews information on the general nature of the customer’s business. To further prevent the origination of illegal robocalls, Pioneer’s terms of service prohibit voice service customers from utilizing the service for any illegal or unlawful purpose.

Know Your Upstream Provider – All of Pioneer’s upstream providers are registered in the FCC’s Robocall Mitigation Database. Pioneer is familiar with its upstream providers and has longstanding business relationships with a majority of them. Prior to adding an upstream provider, Pioneer ensures the provider is registered in the FCC’s Robocall Mitigation Database.

Network Monitoring – Pioneer uses network monitoring software provided by TransNexus to monitor outbound voice traffic to prevent the origination of illegal robocalls. The software detects anomalies,



abnormalities, and unexpected calling patterns, and provides detailed reports identifying suspected illegal robocalls, call spoofing, and suspicious activity. The software generates an alert when the 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.” Also, the software can be programmed to send reports or alerts based on other criteria selected by Pioneer’s network engineers. Pioneer investigates flagged calls to determine if the caller was attempting to originate illegal robocalls. If Pioneer determines a caller was attempting to originate illegal robocalls, the caller may receive a warning to immediately stop originating illegal traffic, or the caller’s service may be terminated, with or without prior notice, as necessary.

Reasonable Do-Not-Originate List – For all calls that transit its network, Pioneer has implemented Do-Not-Originate detection, reporting, and blocking services utilizing TransNexus software. This allows Pioneer to block calls purporting to originate from a number on a reasonable Do-Not-Originate list in accordance with the FCC’s rules.

COMMITMENT TO TRACEBACK REQUESTS

Pioneer commits to cooperating with the Federal Communications Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are using Pioneer’s service to originate calls. Pioneer commits to responding to all traceback requests within 24 hours.

ROBOCALL CERTIFICATION FILINGS

Pioneer has not been prohibited from filing in the Robocall Mitigation Database; nor has Pioneer ever had a prior robocall certification removed by Federal Communications Commission action. Pioneer is not subject to, nor has it ever been the subject of, a Federal Communications Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

PIONEER COMMUNICATIONS – POINT OF CONTACT FOR ROBOCALL ISSUES

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