

WC Fiber, LLC ROBOCALL MITIGATION PLAN

WC Fiber LLC(WCF) Operating Company Number 079J, 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).

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

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), WCF is a member of NTCA which participates on the ATIS Non-IP taskforce working group that developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as WCF's third party representative on the ATIS Non-IP taskforce working group.

WCF also originates calls via SIP connections within its network. WCF has contracted with Alianza/Bandwidth to sign all SIP calls that originate on its network. WCF has registered with the Policy Administrator via its parent company West Carolina Rural Telephone Cooperative, Inc and is an authorized service provider in the STIR|SHAKEN ecosystem. Alianza/Bandwidth signs the calls originating on the IP portions of WCF's network with its certificate.

Robocall Mitigation Plan

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

Call Analytics

Alianza/Bandwidth applies call analytics and reputation scoring against the WCF originating traffic. Outbound voice traffic is monitored in real time and provides detailed reports identifying if WCF customers originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or otherwise has a poor reputation.

Investigation

WCF investigates calls identified as suspicious or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if WCF has any other reason to suspect illegal robocalling or spoofing is taking place over its network, WCF 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 WCF customer is using our network to fraudulently spoof calls or to originate illegal robocalls, WCF

will either warn the customer to stop such practices or terminate their service as allowed per WCF policy.

Know your Customer

WCF has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. WCF 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), phone number, email and other identifiable information.

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. WCF also requires a photo ID for all new customers requesting voice service.

Upstream Provider Knowledge

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

Role In the Call Chain

WCF is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. WCF 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

WCF 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. WCF commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within 24 hours.

Robocall Mitigation Database Eligibility

WCF has not, within the prior two years involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

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

