

West Carolina Rural Telephone Cooperative, Inc. ROBOCALL MITIGATION PLAN

West Carolina Rural Telephone Cooperative, Inc.,(WCRTC) Operating Company Number 0550, 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).

WCRTC provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of WCRTC'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)), WCRTC 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 WCRTC's third party representative on the ATIS Non-IP taskforce working group.

WCRTC also originates calls via SIP connections within its network. WCRTC has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. WCRTC has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of WCRTC's network with its certificate.

Robocall Mitigation Plan

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

Call Analytics

WCRTC has contracted with Ribbon (vendor) to provide 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 reports identifying if our network originates any calls where the calling number has a poor reputation and is potentially an illegal robocall. WCRTC has access to the vendor's portal and receives notifications about any 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.

Investigation

WCRTC investigates calls identified by its internal traffic monitoring as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

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

Know your Customer

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

Upstream Provider Knowledge

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

Role In the Call Chain

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

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

Robocall Mitigation Database Eligibility

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

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