

West Carolina Communications, LLC ROBOCALL MITIGATION PLAN

West Carolina Communications, LLC,(WCC) Operating Company Number 5872, 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).

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

WCC also originates calls via SIP connections within its network. WCC 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. WCC has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of WCC's network with its certificate.

Robocall Mitigation Plan

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

Call Analytics

WCC 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. WCC 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

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

Know your Customer

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

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

Role In the Call Chain

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

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

Robocall Mitigation Database Eligibility

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

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