

STANDING ROCK TELECOMMUNICATIONS

STIR/SHAKEN Implementation

Standing Rock Telecommunications, Inc. (“Standing Rock”) is a rural wireless provider of voice and broadband services on the Standing Rock Sioux Reservation in rural North Dakota and rural South Dakota. Standing Rock is subject to the continuing extension for STIR/SHAKEN under 47 C.F.R. §64.6304(d) for the portions of its network where Standing Rock cannot initiate, maintain, and terminate SIP calls, but Standing Rock complies with the requirements of 47 C.F.R. §64.6303(a)(2) in the portions of its network where it is subject to the continuing extension.

For the portions of Standing Rock’s network where it can initiate, maintain, and terminate SIP calls, Standing Rock has implemented the STIR/SHAKEN authentication framework in the Internet Protocol (“IP”) portion of its network. Accordingly, Standing Rock has certified under Option 2 that some of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and the remainder of the voice traffic that originates on its network is subject to a robocall mitigation program. Standing Rock’s provider of switching services for voice traffic on the IP portion of its network is STRATA Networks / Rural Independent Network Alliance, LLC (“RINA”). Through RINA, the voice traffic originating and terminating on the IP portion of Standing Rock’s network is authenticated using TransNexus STIR/SHAKEN products and services, specifically the Clear IP software platform. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We immediately investigate any identified suspicious calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

All voice traffic is subject to the Robocall Mitigation Plan outlined below.

ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Standing Rock has implemented the Robocall Mitigation Plan summarized below to prevent and mitigate the origination of illegal robocalls. Standing Rock may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that Standing Rock has implemented to detect and prevent illegal robocalls on its network. Standing Rock will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should Standing Rock determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment: Standing Rock is a small tribally owned wireless company offering a variety of voice calling services to the residents of the Standing Rock Sioux Reservation located in North and South Dakota. Its customers generally do not originate high volume calls, and Standing Rock has not received information suggesting that robocalls are originated on its network. While Standing Rock considers its network at a very low risk of originating illegal robocalls, it continues to evaluate its customers and monitor its network carefully for any robocalling activity.

Know Your Customer: Standing Rock examines all new and renewing customers, confirming the identity of the customer including confirming the customer's service address and investigating customers that may be seeking access to high-volume origination services so as to mitigate the potential for customer originated illegal robocalls. Standing Rock verifies customer's credit history and business reputation prior to providing service. Standing Rock verifies customer information when contracts are renewed or services are added. Standing Rock verifies the customer's identity and their right to use the telephone number presented on calls. Standing Rock has policies in place that define the circumstances by which it will deny, suspend or terminate service to a customer, including unlawful or fraudulent use of Standing Rocks services. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues then we terminate their service.

Know Your Upstream Provider: Standing Rock has a vetting and review process for upstream providers, specifically providers that send us voice traffic and that we terminate or that we transit to other providers. We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and that they have appropriate means to identify suspicious traffic. We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, identifying whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider.

Process For Robocall Mitigation: Standing Rock uses a call report to monitor traffic on its network and identify potentially unlawful call origination activity. If Standing Rock has a reasonable basis to believe that a customer is originating illegal robocalls, Standing Rock will investigate and will require the customer to remedy the problem. If effective action is not taken, Standing Rock can suspend and/or terminate service to the customer.

Responding to Traceback Requests: Standing Rock will respond within 24 hours to all traceback requests received from the Commission, law enforcement, and the industry traceback consortium, and will cooperate fully with those entities in investigating and stopping any illegal robocallers that use Standing Rock's service to originate calls. If a pattern of questionable activity is detected, Standing Rock will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

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