

ETC Communications (OCN 205D) has approximately 9,815 voice service subscriber lines (counting the total of all business and residential fixed subscriber lines aggregated over all of the provider's affiliates) and qualifies as a small voice service provider [64.6304 (a)(2)] that maintains IP and Non-IP switching equipment [64.6304(d)] and thus was exempt from the requirements of overall STIR/SHAKEN implementation until June 30, 2023.

Even before that deadline, ETC implemented the STIR/SHAKEN authentication framework (via the TransNexus ClearIP service) on the IP portions of its network that are attached to the PSTN (Mainly Outbound LD Trunks for ETC's CIC 5360). However, ALL calls that originate on ETC's network are subject to an ongoing robocall mitigation program as detailed further below.

As a rural ILEC maintaining both TDM and IP switches, we plan for our STIR/SHAKEN deployment to grow as our TDM carrier trunks (and eventually our remaining TDM switch) are replaced by IP over time.

ETC only connects to name-brand carriers with widely known positive reputations, and all are listed in the industry RMD. Furthermore, ETC itself has not been prohibited in any way from filing in industry's RMD. Also, ETC has not been the subject of any investigation or been suspected of being the originating source network of an illegal robocall operation.

ETC has put in force the following reasonable policies and steps to avoid originating illegal robocall traffic as part of its Robocall Mitigation Program:

Background - Voice Network Architecture:

- We have two telephone switches in our network today:
- The first is a Lucent 5ESS (Legacy TDM). It primarily acts as our overall Class 4 PSTN tandem.
 - Being dual-purpose, it also serves approximately 1/3 of our subscribers as a Class 5 end-office.
- The second is a MetaSwitch/Alianza softswitch. It primarily acts as a Class 5 end-office.
 - It serves approximately 2/3 of our subscriber lines.
 - However, it will also become our Class 4 tandem over time as SIP trunk groups to carriers grow.

Customer Verification

- Residential – We maintain records of the following for all residential subscribers:
 - Name, Address, CBR Number, Email Address, Last 4 SSN Digits, and an Account Password.
- Business – We maintain records of the following for all business subscribers:
 - Business Address, Main Contact Name, Main Contact CBR Number, Main Contact Email Address, Tax IDs as applicable, and an Account Password.

Number-Spoofing Prevention:

- It is virtually impossible to spoof/mask the Calling Number on the lines in our 5ESS.
 - No number-masking capability is available to either subscribers or us in provisioning.
- We can mask Calling Numbers (legitimately) in the MetaSwitch, but only in provisioning.
 - No number-masking capability is made available to subscribers for their lines at all.

Multi-Channel Business Service Considerations & Policies:

- We only have a relative handful of business customers who have sufficient concurrent call/channel-capacity (PRI or SIP Trunks) to even attempt to launch a (malicious) robocall campaign.
 - These larger customers ALL hospitals, doctor's offices, power EMCs, and a few manufacturers.
 - Any automated calls they launch are legitimate appointment or billing reminders.
 - The traffic for each one is such that their inbound calls vastly outnumber their outbound calls.
 - These patterns are monitored regularly by both our central office and billing personnel. Our Long Distance traffic is monitored and abnormal patterns are throttled/blocked by our ULC.
 - Allowed outbound calling numbers for these customers are required by our switch to be in the valid 10D format and must be one of their legitimately owned local DIDs with very few exceptions.
- In summary, it would already be EXTREMELY difficult for a malicious robocall campaign to be occurring on our network without us soon knowing about it and swiftly dealing with it.
 - Upon the discovery of a robocall campaign, we would diplomatically notify the offending business in writing and insist they immediately cease their illegal activity.
 - If they prove unresponsive or remain non-compliant, we will take additional steps to severely limit their outbound calling capability until acknowledgement and cooperation are given.

Inbound & Outbound DNO List Comparison & Blocking

- In late 2025, ETC approached AWARD Consulting in Alameda, CA to implement their Inbound & Outbound DNO List Comparison Service in our voice network.
- It compares ALL calls in both directions traversing our switch with their aggregate DNO list which includes the official ITG list plus many more invalid prefix patterns. All flagged calls are promptly blocked.
- The aggregate DNO list provided by AWARD Consulting will be updated quarterly in our system.

Trace-Back Participation:

- We at ETC stand ready to cooperate and actively participate in trace-back efforts made by either government agencies (FCC/ITG) or other service providers and carriers.
 - Industry and regulatory cooperation are bedrock principles in maintaining a healthy communications network worldwide.
 - Although response will always be given within the required 24 hours from notification, we will assign the trace-back task immediately and begin research as soon as any request is received.
 - Please contact our NOC at 706-276-9851 for trace-back assistance.