



Wheat State Telephone, Inc.; d/b/a, Wheat State Technologies
Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Wheat State Telephone, Inc.; d/b/a, Wheat State Technologies (WST) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

WST has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. WST vets the identity of new residential and business customers, which includes conducting credit checks. With regard to new business customers, WST collects information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

WST’s business customers are mostly small business, all of whom are physically located in WST’s service territory. Consequently, WST has never received a request for high-volume origination services. However, were WST to receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service.

All WST voice customers can place only one call at a time and are only able to originate calls from the phone number that has been assigned to them. This greatly mitigates the likelihood of illegal robocalls originating on WST’s network.

WST monitors call origination volume on customer lines. If a threshold volume on a line is exceeded, WST will follow up with the customer to investigate the reason for the high volume of calls. If, upon investigation, WST were to determine the customer was using their service to make illegal robocalls, we would act quickly to put an end to the unlawful activity, and may suspend or terminate the customer’s service as appropriate.

UDALL OFFICE:

📍 106 W First St, PO Box 320, Udall, Kansas 67146
📞 620.782.3341 1.800.442.6835

OLPE OFFICE:

📍 110 W Bitler PO Box 166 Olpe KS 66865
📞 620.475.3301 1.800.440.3018

POTWIN OFFICE:

📍 107 E Violet PO Box 36 Potwin KS 67123
📞 620.752.3212 1.800.387.7739

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WST's Terms and Conditions documents expressly prohibit the use of WST's services for any illegal purposes and states that service may be terminated if its services are being abused in such a manner. WST would not hesitate to enforce this policy if necessary.

"Know-Your-Upstream Provider" Procedures

WST has connections with only a few upstream providers (Kansas Fiber Network, Sinch, and AT&T). These connections have been in place for many years and we know these providers very well. Before accepting traffic from any new upstream provider, WST would exercise due diligence and seek to ensure that the provider is not using WST to carry or process a high volume of illegal traffic. Specifically, WST would collect information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

WST does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

WST commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.

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WST Business Practice and Robocall Risk Assessment

Wheat State Technologies' (WST) serving areas are comprised primarily of bedroom-communities. Each small commuter town provides residential housing, but features little to no industry or employment centers. Most residents must commute to another town for work. Wheat State customers generally do not originate high volume calls and WST has not identified data suggesting robocalls are originating on our network. Wheat State does not consider its network at high risk of originating illegal robocalls, but will continue to monitor and evaluate originating traffic on the network.

- All residential and business lines are only able to place one call at a time
- All residential and business lines are only able to place calls originating from their assigned phone number.
- All residential and business lines are only assigned numbers from Wheat State's local exchange number database.
- All residential and business lines and associated caller ID is reviewed at activation to create and verify legitimate caller ID data entry. Wheat State does not allow customer manipulation of caller ID.
- New customer requests for voice activations cannot be connected without completing an application for service and fulfilling a specific data request of personal or business identifying information. Full legal name verified through government ID and personal or business credit report

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WST monitors calling volumes with thresholds.

Listed below are the measures WST has taken to prevent fraudulent activity on its network. Customer calling usage is reviewed daily. If WST observes a customer is originating an unusually high number of calls per day on average on a single line, it would trigger an investigation into the reason for the call volume. WST has established a daily "High Calling Threshold." If it is found the call volume is due to robocalling: Customer would be notified and given 24 hours to cease and desist. If activity continues customer would again be notified using all contact methods shared during the activation process. Line would be disconnected after a specific number of days.

Steps to Avoid Originating Illegal Robocall Traffic

What follows are the specific steps WST has taken to avoid originating illegal traffic.

All voice customers of WST are subject to terms contained in local exchange tariffs filed with the state public utility commission, the Kansas Corporation Commission (KCC). These terms are as follows:

Express Prohibition of Fraudulent Use of the Services. Wheat State's local tariff provisions will permit WST to refuse to furnish or deny telephone service to any person, firm, or company who over Wheat State's facilities impersonates or permits others to impersonate any other individual with fraudulent or malicious intent, and any connected individual or entity displaying high-volume abusive originating calling patterns and activity.

Cooperate with Industry, and State/Federal Regulators

WST is committed to ensure the WST network is not utilized for fraud. WST will respond fully and in a timely manner to all call traceback requests from the Commission, law enforcement, and the industry Traceback Consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers using its network to originate calls.

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STIR/SHAKEN Implementation Update

WST has a STIR/SHAKEN implementation obligation to “sign” calls. Due to this obligation WST has engaged with a combination of third parties to perform the technological act of signing calls. WST makes all attestation-level decisions regarding the caller ID information of each call it originates and ensures that all calls are signed using our own certificate obtained from a certificate authority.

DO-NOT-ORIGINATE List

WST originates calls from its six local NPA/NXXs located in rural Kansas and excludes all other call origination.

Eighth Report and Order Call Blocking Rules

The 603+ Robocall Mitigation rule is for call blocking and robocall mitigation efforts. It mandates that all domestic voice service providers must block calls that are highly likely to be illegal based on a reasonable do-not-originate (DNO) list. Additionally, it requires that all voice service providers in the call path must return SIP code 603+ when calls are blocked based on reasonable analytics. WST’s network update to include this feature is subject to switch manufacturer’s update schedule.

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