

## **XIT Rural Telephone Cooperative, Inc ROBOCALL MITIGATION PLAN**

XIT Rural Telephone Cooperative, Inc (XIT), Operating Company Number (2170), 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).

XIT provides local service to fewer than 100,000 voice subscriber lines. Most XIT customers are served on the non-IP portions of XIT's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), XIT is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. XIT's non-IP network is connected to carriers that do not support IP connectivity, therefore, XIT cannot upgrade its Non-IP network to IP.

### **Robocall Mitigation Plan**

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

#### **Call Analytics**

XIT is under contract with TransNexus to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. XIT has access to the vendor's portal and receives real-time event-based notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs.

#### **Investigation**

XIT promptly investigates calls identified as potential illegal robocalls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if XIT has any other reason to suspect illegal robocalling or spoofing is taking place over its network, XIT 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 XIT customer is using our network to fraudulently spoof calls or to originate illegal robocalls, XIT will immediately mitigate the illegal robocall traffic by either warning the customer to stop such practices or terminating their service as allowed per XIT policy.

All XIT customers receive notice of our company's prohibited use of its network for the initiation of fraudulent spoofing and robocalls. If the customer is found in violate of the prohibited use terms, their service may be terminated.

### **Know your Customer**

XIT has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. XIT 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 establish a security question, and a password.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password.

XIT also requires a photo ID for all new customers requesting voice service.

### **Upstream Provider Knowledge**

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

### **Traceback**

XIT 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. XIT will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.