

Reedsburg Utility Commission

Robocall Mitigation Plan

1. Reedsburg Utility Commission (RUC) is a phone service provider providing service from a wholesale upstream provider that is fully STIR/SHAKEN compliant.
2. “Know Your Upstream Providers”: In accordance with the Commission’s directive in Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59 (Rel. May 19, 2023) ¶¶ 49-51, RUC provides the following information concerning its upstream voice service carrier:
 - a. Inteliquent/Sinch: RUC has a master service agreement with Inteliquent/Sinch and has received written assurances from their officials that it has and will continue to sign calls submitted to RUC and will abide by the FCC’s STIR/Shaken and robocall mitigation rules in all respects when providing voice services to RUC. RUC and Inteliquent/Sinch have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.
3. RUC is committed to respond 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 any illegal robocalls that use its service to originate calls on a timely basis.
4. RUC has procedures in place to prevent new and renewing customers from using its network to originate illegal robocalls. RUC thoroughly vets new residential and business customers to the fullest extent possible to ensure that use of its numbering resources is valid and legal including:
 - a. “Know Your Customer” (KYC): Prior to authorizing phone service with a requesting subscriber, RUC confirms the subscriber’s identity by vetting a subscriber directly. The vetting process includes collecting information such as:
 - i. Physical business location
 - ii. Contact person(s) names
 - iii. Intended use of the phone service requestIf it is determined that the services requested will be used for illegal robocalls, we will refuse to initiate the services.
 - b. Acceptable Use Policy: RUC maintains an Acceptable Use Policy (AUP) that subscribers must sign before receiving service through RUC. Within our AUP it prohibits:
 - i. Providing altered or false information about the identity of the sender of origin of a message or phone call.
 - ii. Violating any applicable local, state or federal law.
 - iii. Using RUC’s service to engage in or in connection with fraudulent activities.
5. RUC is not a foreign voice provider
6. RUC has not been the subject of a formal Commission, law enforcement, or regulatory agency action of investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall mitigation Database certification of mitigation program description.
7. RUC has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.