

Kaplan Telephone Company Robocall Mitigation Program

Kaplan Telephone Company (Kaplan) is a small telecommunications service provider serving a rural community in southern Louisiana. Kaplan serves approximately 1,530 voice lines, comprised of 1,149 residential lines and 381 business lines. Approximately 25 percent of the business lines are subscribed to by single-line businesses.

Type of Extensions Received Under 47 C.F.R. §64.6304

Kaplan has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)).

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps Kaplan has taken to avoid originating illegal robocall traffic.

1. Call Analytics: Kaplan uses Transaction Network Services' Call Guardian call analytics solution to monitor traffic on our network and identify potentially unlawful call origination activity. Call Guardian uses cross carrier real-time call events combined with crowd-sourced data to create accurate and comprehensive reputation profiles differentiating legitimate users of communications services from abusive, fraudulent, and unlawful users. Kaplan will immediately investigate any calls identified by the Call Guardian service to determine if the customer was originating illegal robocalls. If Kaplan determines that a customer is originating illegal robocalls, we will warn the customer to stop doing so immediately. If the customer does not cease their unlawful activity, Kaplan will terminate their service.
2. Know-Your Customer Policy: Kaplan's business customers are small businesses that are physically located in our service territory. As a result, Kaplan has never received a request for high-volume origination services. However, were Kaplan to ever receive such a request, we would thoroughly vet the identity of the potential subscriber prior to providing service. In particular, we would collect 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. Kaplan currently collects the tax ID number of all new business customers.

Status of STIR/SHAKEN Implementation

On June 27, 2022 Kaplan implemented STIR/SHAKEN, thru Transaction Network Services, for voice traffic that originates or terminates on the network of Kaplan. Kaplan is authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls. In addition, Kaplan will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.