



Farmers Telephone Cooperative, Inc. Robocall Mitigation Plan

STIR/SHAKEN

Farmers Telephone Cooperative, Inc. ("FTC"), Operating Company Number 0520, 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). FTC provides local service to fewer than 100,000 voice subscriber lines. All customers are served on the 100% non-IP network. To meet the non-IP network criteria for the continuing STIR_SHAKEN extension §64.6303 (a)(2)), FTC is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as FTC's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Farmers Telephone Cooperative, Inc. has registered with the Policy Administrator. Since the cooperative network is 100% non-IP, FTC only signs calls for its subsidiary FTC Diversified Services, LLC.

All voice traffic originating on the FTC network is subject to the following Robocall Mitigation Plan.

CALL ANALYTICS AND NETWORK MONITORING

FTC will utilize multiple tools for monitoring and validating both originating and terminating voice traffic within its network. Tools used to identify and investigate suspected illegal robocalls include:

- ***Equinix Protector*** will be used to analyze originating call records and identify suspicious activity. Network investigation options to better identify possible fraud/illegal robocalling enable the following:
 - Monitoring network usage in real time
 - Identifying suspicious network activity based on abnormal call activity, patterns, and volume
 - Receiving automatic alerts
 - Distinguishing fraud from legitimate customer usage
 - Providing efficient case management
 - Implementing effective measures to prevent origination of illegal calls
- ***Empirix Protocol Analyzer*** will be used to further analyze suspicious calls and determine if customer notification is needed.
- ***Metaswitch SAS (Service Assurance Server)*** will be used to troubleshoot and validate calls once potential robocalls have been identified to authenticate the customer activity.

ENFORCEMENT

As a local exchange carrier in the state of South Carolina, FTC is required to file its rates, terms, and conditions with the Public Service Commission of South Carolina. In accordance with this obligation, FTC maintains its General Services Tariff on file with the PSC and public availability at <https://etariff.psc.sc.gov/>

FTC also makes this tariff available on its corporate website at <https://www.ftc.net/about-us/ftc-policy-guidelines/>

FTC clearly affirms that service must be used for lawful purposes and any unlawful use of service will result in termination of service as stated in § A2.2.9 Unlawful Use of Service:

Subscriber telephone service is furnished subject to the condition that it will not be used for an unlawful purpose. Service will be discontinued if any law enforcement agency, acting within its apparent jurisdiction, advises in writing that such service is being used in violation of law. The Cooperative will refuse to furnish service when it has reasonable grounds to believe that such service will be used in violation of law.

KNOW YOUR CUSTOMER

Prior to service establishment with FTC, residential and business customers must provide identification to support their request for establishing service with FTC. Identification may include, but not be limited to the following:

- Full name
- Complete address
- Photo ID
- Social Security number for credit check and security deposit requirement
- Federal Tax ID number

UPSTREAM PROVIDER KNOWLEDGE

FTC knows all carriers from which it receives traffic and has confirmed that all carriers are listed in the Robocall Mitigation Database. The RMPs of the connecting carriers have been reviewed to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Also, FTC now requires traceback and prohibited traffic language in all contractual agreements with carriers.

ROLE IN THE CALL CHAIN

FTC is a small voice service provider without a STIR/SHAKEN obligation on its non-IP network since the network is dependent on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

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1101 E. Main Street / PO Box 588 / Kingstree, SC 29556 (843) 382-2333 / FAX (843) 382-3200 / www.ftc.net

TRACEBACK

FTC affirms that it will respond to all traceback requests from the Commission, civil, and criminal law enforcement, and the Industry Traceback Consortium Group pursuant to FCC rules. FTC has designated a primary point of contact to address traceback requests during normal business hours as well as a secondary point of contact to address traceback requests after hours and on weekends and holidays. Please note the contact information below for coordinating these requests:

- Primary Point of Contact: Michael Welch
Traffic and Translations Engineer
1101 East Main Street, Kingstree, SC 29556
843-382-1260
welchm@ftc.org
- Secondary Point of Contact: Network Operations Center
140 South Pike Road, Sumter, SC 29150
888-925-7351
noc@ftc.org

FTC affirms that upon receiving a valid TRACEBACK request from a duly authorized party it will promptly investigate the traffic identified in the notice and either take steps to effectively mitigate the identified traffic or respond to the Commission that the service provider has a reasonable basis for concluding that the identified calls are not illegal. FTC will fully respond to traceback requests from the Commission, civil and criminal law enforcement, and the Industry Traceback Consortium within twenty-four (24) hours of receipt of the request. Mitigation practices will include the following:

- Investigating to identify the source of the traffic
- Verifying that the originating customer owns or is authorized to use the Caller ID number
- Determining the Caller ID name sent to a receiving party matches the customer's name of record
- Terminating the party's ability to originate, route, or terminate calls
- Contacting appropriate law enforcement authorities

ROBOCALL MITIGATION DATABASE ELIGIBILITY

FTC affirms it has not been prohibited from filing in the Robocall Mitigation Database.

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