

Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan

Nucla-Naturita Telephone Company
NNTC Wireless, LLC

Executive Summary

The purpose of this Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan (RMP) is to implement best practices, procedures and policies to mitigate or reduce originating illegal traffic (aka robocalls).

Nucla-Naturita Telephone Company and NNTC Wireless, LLC (NNTC) will:

1. Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - a. <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
2. Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
3. Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
 - a. Investigate suspected illegal traffic
 - b. Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - i. Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
4. Prevent any calls being blocked to or from emergency services
5. Implement the following best practices, policies and procedures as part of NNTC's RMP

Point of contact for this RMP:

Primary Contact: Nathan Tomlinson
Title: Senior Vice President
Address: 421 Main Street, P.O. Box 520, Nucla, CO 81424
Phone: (970) 864-7335
Email: nate@nntc.bz

Regulatory Background

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on SIP/IP traffic on their networks as well as to implement an RMP on non-SIP/IP traffic (aka TDM traffic) on their network.

The FCC granted a continuing extension for voice service providers with non-IP networks (aka TDM) from implementing STIR/SHAKEN authentication. Below are the rule sections that apply to NNTC:

NNTC Wireless' network is fully IP.

§ 64.6304 Extension of implementation deadline.

(a) ***Small voice service providers.***

(2) For purposes of this [paragraph \(a\)](#), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).

(d) ***Non-IP Networks.*** Those portions of a voice service provider or gateway provider's network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls are deemed subject to a continuing extension. A voice service provider subject to the foregoing extension shall comply with the requirements of [§ 64.6303\(a\)](#) as to the portion of its network subject to the extension, and a gateway provider subject to the foregoing extension shall comply with the requirements of [§ 64.6303\(b\)](#) as to the portion of its network subject to the extension.

§ 64.6303 Caller ID authentication in non-IP networks.

(a) Except as provided in [§§ 64.6304](#) and [64.6306](#), not later than June 30, 2021, a voice service provider shall either:

(1) Upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework as required in [§ 64.6301](#) throughout its network; or

(2) Maintain and be ready to provide the Commission on request with documented proof that it is participating, either on its own or through a representative, including third party representatives, as a member of a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution, or actively testing such a solution.

Basis for Exemption

NNTC is a “small voice service provider” that has approximately 1,183 voice service subscriber lines aggregated over all of the company’s affiliates. NNTC voice network is currently partial IP and partial non-IP for outgoing traffic to the tandem. For the non-IP portion of its network, it is required to comply with the requirements of §64.6303 (a). This non-IP tandem connection carries some of their traffic to the outside world and relies on a technology that cannot originate, carry, process, or terminate SIP calls.

Meeting §64.6303(a)(2) Obligations

NNTC is a member of NTCA, and the National Exchange Carrier Association (NECA) which act as its third party representative to develop a non-internet Protocol caller identification authentication solution. NTCA and NECA are members of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Roll in the Call Chain

NNTC is a voice service provider providing voice service and broadband services to end user customers inside its regulated serving area. NNTC has a partial a STIR/SHAKEN obligation at this time due to having both IP network and non-IP network (see above).

Operating Company Number (OCN)

NNTC Operating Company Number (OCN) is 2193 and 775D.

Status of participation in the Robocall Mitigation Database (RMD)

NNTC has not been prohibited from filing in the RMD.

Commission, law enforcement and/or regulatory action or investigation related to spoofing or suspected unlawful robocalls

NNTC has not been involved in any Commission, law enforcement and/or regulatory action related to spoofing or suspected unlawful robocalls. NNTC has not been removed from the RMD and precluded from refiling due to deficiencies needing to be cured. NNTC authorization has not been revoked due to continuing violations of the Commission’s robocall mitigation rules.

Prior two years status

In the past two years NNTC has not been the subject of a formal Commission, law enforcement and/or regulatory action or investigation with accompanying findings of actual or suspected wrongdoing due to NNTC transmitting, encouraging, assisting or otherwise facilitating illegal robocalls or spoofing related to spoofing or suspected unlawful robocalls.

Know your upstream provider

NNTC blocks traffic from carriers that are not in the RMD or have been removed from the RMD.

For NNTC's wireless customers, the Rural Independent Network Alliance, LLC dba RINA, a Strata Networks Company (Strata) is the upstream provider for all of NNTC's wireless traffic. Strata has a vetting process for its upstream providers that send it voice traffic that they terminate to carriers such as NNTC. Strata confirms their upstream providers have a certification in the Robocall Mitigation Database and does not accept voice traffic from unregistered providers. Strata requires its upstream providers to have a reasonable Robocall Mitigation Plan, including vetting processes for customers and upstream providers and that they use call analytics to identify suspicious traffic. Strata has established an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. Strata uses this information to understand whether Strata will be obligated to authenticate unsigned traffic that Strata receives from them. Strata's contractual provisions with upstream providers prohibit them from sending Strata illegal robocalls. If Strata finds that an upstream provider is sending Strata suspicious robocalls, Strata warns them to stop. If such traffic continues, then Strata will terminate their service.

Know your Customer

NNTC takes the following steps to prevent new and existing customers from originating robocalls over its network:

- The vast majority of NNTC subscribers are defined as a "direct" retail consumer or commercial end users located inside our serving areas
 - These subscribers are best defined as residential and small business customers and NNTC will:
 - Validates the residential or business customer's identity
 - Validates the physical location which will be the fixed location where service is established
 - For wireless customers the physical location is not validated
- NNTC has no Commercial VoIP customers at this time. If NNTC obtains one or more, NNTC will gather the following information as reasonably practical to "Know your Customer":
 - Physical business location
 - Contact person's information
 - State or country of incorporation
 - Federal tax ID number

- NNTC does not offer service currently to wholesale subscribers

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Long Distance Traffic

NNTC uses a third party administrator, Ribbon, for call analytics systems used to identify and block illegal traffic. Ribbon provides STIR/SHAKEN, originating robocall mitigation and terminating robocall mitigation services which uses SIP to perform Reputation Scoring services. SIP INVITEs are sent that evaluate the calling party number, called party number, time of call, local and national data to calculate the likelihood that the call attempt was illegally spoofed. If the fraud score is 80 or above the call is terminated.

See Appendix A for a copy of the Subscription Services Order Form by NNTC for Ribbon's service.

Additionally, NNTC has implemented the following best practices, policies and procedures to mitigate unlawful illegal traffic (robocalls):

- Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
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 - Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
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Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Wireless Traffic

For wireless customers, the Rural Independent Network Alliance, LLC dba RINA, a Strata Networks Company (Strata), provides them with a Stir/Shaken implementation obligation serving end users. Strata uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if Strata processes outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

Additionally, NNTC has implemented the following best practices, policies and procedures to mitigate unlawful illegal traffic (robocalls):

- Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
- Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
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- Prevent any calls being blocked to or from emergency services

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Local and/or EAS Traffic

NNTC has implemented the following best practices, policies and procedures to mitigate unlawful illegal traffic (robocalls):

- Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
- Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
- Investigate suspected illegal traffic
 - Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
- Prevent any calls being blocked to or from emergency services
- Nearly all residential and business lines can place only one call at a time
- All residential and business lines are only able to place calls originating from their own phone number
- Only numbers residing in our switch are assigned to residential and business lines
- Investigate any complaints about legitimate calls being blocked
- Watch for any overflow on our trunks which would indicate a significant increase in local and/or EAS traffic
- Record actual PEG/Attempts and MOUs/CCSs on the switch and monitor for abnormal increases or changes

Appendix A Third Party Service Agreements



ribbon

SUBSCRIPTION SERVICES ORDER FORM

Ribbon Communications

Selling Entity:
Ribbon Communications
Operating Company, Inc.
6500 Chase Oaks Blvd,
Suite 100
Plano, TX 75023
US

Customer: NUCLA-NATURITA TELEPHONE
COMPANY

Valid Through: May 4, 2023

Quote #: RB-355196

Issued by: James Smith

CUSTOMER DETAILS

Bill To:	NUCLA-NATURITA TELEPHONE COMPANY	Ship To:	NUCLA-NATURITA TELEPHONE COMPANY
Street	412 MIAN STREET,	Street	412 MIAN STREET,
City	Nucla	City	Nucla
State	CO	State	CO
ZIP	81424	ZIP	81424
Company Name	NUCLA-NATURITA TELEPHONE COMPANY		
Technical Contact Name	Nathan Tomlinson		
Technical Contact Phone Number			
Technical Contact E-mail Address			

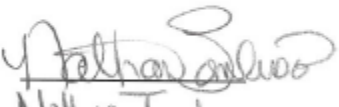
TERMS AND CONDITIONS

Customer Requested Start Date	TBD	Billing Frequency:	Monthly
The Initial Service Term:	12 Months	Payment Terms:	Net 30
Service Start Date:	If the PO for this project is received by March 15, 2023, Ribbon will defer initial invoicing for the STSHaaS and STI-CR subscriptions until July 2023		

COMMITTED SERVICES ORDERED**

Part Number	Monthly Recurring Services Description	Service Term (months)	Quantity	Extended Monthly Net Price (USD)
IDH-STICR-T1-CMT	ID HUB STI CERTIFICATE REPOSITORY SUBSCRIPTION; UP TO 10M COMMITTED TRANSACTIONS PER MONTH; SOLD IN BLOCKS OF 100K TRANSACTIONS PER MONTH	12	3	
IDH-STSH-T1-CMT	ID HUB STIR SHAKEN SUBSCRIPTION; 5M-10M COMMITTED TRANSACTIONS PER MONTH; SOLD IN BLOCKS OF 100K TRANSACTIONS	12	50	
RC-24X7-SS-IDHAAS	24X7 MONTHLY SUPPORT AND MNOC SERVICES INC WITHIN IDENTITY HUB SUBSCRIPTION	12	1	
Total Commit Fee - (Monthly Recurring Fee)			USD	
Part Number	Non-Recurring Services Description	Quantity	Extended Net Price (One-Time) (USD)	
Initial Onboarding Fees (Non-Recurring Fee)				
IDH-SERVICE	PLAN - SUBSCRIPTION TO ID HUB SERVICES. ACTUAL SERVICE USED WILL BE INVOICED	1		
IDH-B-STSH-ONBRD	IDENTITY HUB STIR SHAKEN BUNDLE ONBOARDING ONE TIME SERVICE FEE	1		
Total Initial Fee (Non-Recurring Fee)		USD		
Part Number	Annual Recurring Services Description	Service Term (months)	Quantity	Extended Annual Net Price (USD)
IDH-CA-365D	IDENTITY HUB STI CERTIFICATE AUTHORITY FEE FOR ONE CERTIFICATE; UP TO 365 DAYS VALIDITY (INVOICED UPON EACH CERTIFICATE CREATION EVENT - 1 PER YEAR ASSUMED)	12	1	
Total Commit Fee - (Annual Recurring Fee)			USD	
Minimum Annual First Year Spend		USD		

SIGNATURE

Customer Name	NUCLA-NATURITA TELEPHONE COMPANY	Ribbon Communications Operating Company, Inc.
Signature		Signature
Name	Nathan Tomlinson	Name
Title	IT	Title
Date	2-15-23	Date

Certification of Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan by Officer of the
Company

I, Darla Joseph, certify that the above information is true and correct to the
best of my knowledge. My title is, President, and am an officer of the
company.