
High Plains Telecommunications, Inc.

Robocall Mitigation Plan

High Plains Telecommunications, Inc. (“High Plains”) does not have a *STIR/SHAKEN* implementation obligation because it lacks control of network infrastructure that is necessary to implement *STIR/SHAKEN*. Nevertheless, all calls that originate on High Plains’ network are subject to its Robocall Mitigation Plan.

Preventing The Origination of Illegal Robocalls

High Plains takes the following steps to prevent the origination of illegal robocall traffic:

Know Your Customer Policy – High Plains utilizes a know your customer policy to prevent voice services from being used by new and renewing customers to originate illegal robocalls. High Plains’ policy is based on the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). High Plains vets the identity of subscribers as part of the application for service process. High Plains vets the identity of customers as part of the application for service process. For example, High Plains collects and reviews information related to a residential or business customer’s service location, mailing address, designated contact persons, and persons authorized to make account changes. For business customers, High Plains also collects and reviews information on the general nature of the customer’s business. High Plains prohibits all voice service customers from utilizing the service for any illegal or unlawful purpose.

Network Monitoring – High Plains uses network monitoring software provided by TransNexus to monitor outbound voice traffic to prevent the origination of illegal robocalls. The software detects anomalies, abnormalities, and unexpected calling patterns, and provides detailed reports identifying suspected illegal robocalls, call spoofing, and suspicious activity. The software generates an alert when the network originates any calls where the calling number is invalid, unallocated, on a Do-Not-Originate list, in the FCC consumer complaint database, or has a “poor reputation.” The TransNexus software provides Do-Not-Originate detection, reporting, and blocking services for calls that transit the network. This allows High Plains to block calls that are highly likely to be illegal based on a reasonable Do-Not-Originate list in accordance with the FCC’s rules. Also, the software can be programmed to send reports or alerts based on other criteria selected by High Plains’ network engineers. High Plains investigates flagged calls to determine if the caller was attempting to originate illegal robocalls. If High Plains determines a caller was attempting to originate illegal robocalls, the caller may receive a warning to immediately stop originating illegal traffic, or the caller’s service may be terminated, with or without prior notice, as necessary.

Know Your Upstream Provider – High Plains’ sole upstream provider is its parent company, Pioneer Communications, which is registered in the FCC’s Robocall Mitigation Database.

Reasonable Do-Not-Originate List – For all calls that transit its network, High Plains has implemented Do-Not-Originate detection, reporting, and blocking services utilizing TransNexus software, allowing it to block calls purporting to originate from a number on a reasonable Do-Not-Originate list in accordance with the FCC’s rules.

Commitment To Traceback Requests

High Plains commits to cooperating with the Federal Communications Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are using High Plains' service to originate calls. High Plains commits to fully responding to all traceback requests within 24 hours.

Robocall Certification Filings

High Plains has not been prohibited from filing in the Robocall Mitigation Database; nor has High Plains ever had a prior robocall certification removed by Federal Communications Commission action. High Plains is not subject to, nor has it ever been the subject of, a Federal Communications Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

High Plains – Point of Contact – Robocall Issues

Kendall Metcalf
Network Operations Manager
Email: noc@pioncomm.net
Phone: (620) 356-1921

High Plains Telecommunications, Inc.
120 West Kansas Avenue
P.O. Box 707
Ulysses, KS 67880
620-356-3211