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PALAU NATIONAL COMMUNICATIONS CORPORATION (PNCC) ROBOCALL MITIGATION PLAN

The Palau National Communications Corporation, (hereinafter “PNCC”), submits this Robocall Mitigation Plan to the Federal Communications Commission (“FCC”). PNCC currently complies with efforts to avoid originating illegal robocalls and is committed to responding to traceback requests to cooperate with investigating and stopping illegal robocalls.

The accurate identification of a subscriber is tied to a telephone number based caller identity associated with that subscriber. PNCC requires a signed contract with all its subscribers. PNCC confirms a subscriber’s identity by vetting subscriber details directly (physical location, contact info, ID number, etc.)

PNCC will respond to all traceback requests from the FCC and/or a registered traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use our services to originate calls. Call Detail Records (CDRs) are created for all calls and stored in a searchable database, and include all data such as ANI, originating IP address, timestamps, etc. and stored for over 36 months.

PNCC implements CCID (Charging/Change CID) that could change subscriber’s number to each charging number within call transaction process. By this, PNCC is able to trace the real number even if a fake number is being used.

PNCC is a small voice service provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR/SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

(a) Small voice service providers.

(1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.

(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).

PNCC is implementing a robocall mitigation program as described below, requiring all voice traffic that originates on our network be subject to these stringent standards. PNCC monitors outbound voice traffic in real time to identify and mitigate any irregular traffic patterns to reduce fraudulent and/or illegal robocall traffic. When PNCC identifies potential fraudulent, abusive, suspicious, or robocalling traffic patterns; it acts swiftly to mitigate this activity by:

- (1) Blocking or rejecting known fraudulent/abusive traffic or invalid originating numbers
- (2) Blacklisting a known fraudulent/abusive number
- (3) Tracing the call traffic back to the originating party
- (4) Reporting instances of irregular traffic activity to our carrier/customer
- (5) Requiring the customer to remediate and detail the cause of said irregular traffic
- (6) Taking action such as suspension or termination for violations.