

CITIZENS TELEPHONE CO., INC. - ROBOCALL MITIGATION PLAN

Citizens Telephone Company (Citizens), Operating Company Number 0355, 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).

Citizens provides local service to fewer than 100,000 voice subscriber lines. Most customers are served on the IP portions of the Citizens network which relies on technology that initiate, maintain, carry, process and terminate SIP calls. To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§64.6303 (a)(2)). Citizens 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 Citizens' third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Citizens is registered with the Policy Administrator and is an authorized provider in the STIR/SHAKEN ecosystem. Citizens has contracted with Toly to sign all SIP calls that originate on its network with the Citizens token. Citizens provides Toly the attestation level to apply to all Citizens origination IP calls.

Robocall Mitigation Plan

All voice traffic that originates on Citizen's network is subject to the following Robocall Mitigation Plan.

Call Analytics

Citizens has contracted with JSI, LLC for its Robocall Origination Detection Service. JSI downloads Citizen's CDRs and look for patterns indicative of originating robocalls. JSI provides Citizens a report identifying the suspected illegal robocall activity for investigation.

Investigation

Citizens investigates calls identified by its analytics vendor as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Citizens has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Citizens will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Citizens customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Citizens will either warn the customer to stop such practices or terminate their service as allowed per Citizens' policy.

Know your Customer

Citizens has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Citizens thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Upstream Provider Knowledge

Citizens knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Citizens has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, Citizens is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

Citizens is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Citizens is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Citizens commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Citizens commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within 24 hours.

Robocall Mitigation Database Eligibility

Citizens has not, within the prior two years, been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Citizens has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Citizens posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.