

## Union River Telephone Company – OCN 0027

### Robocall Mitigation Plan

Union River Telephone Company is eligible for the continuing extension of the STIR/SHAKEN implementation deadline as a provider that has non-IP portions within its network §64.6304(d).

1. Union River Telephone Company is a voice service provider that is in the process of implementing the STIR/SHAKEN authentication framework as required by law. Because portions of Union River Telephone Company's network rely on technology that cannot initiate, maintain, carry, process, and terminate SIP. Union River Telephone Company has been working with Inteliquent and iconectiv to develop a non-IP caller identification authentication solution.
2. Union River Telephone Company commits to respond in a timely manner within twenty-four (24) hours to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocalls that use its service to originate calls.
3. Union River Telephone Company has taken the following specific steps to detect originating robocall traffic:
  - a. Union River Telephone Company uses a third-party analytics vendor TNSI to monitor call records and outbound traffic logs to watch for changes in traffic pattern which would indicate robocalling patterns. This system alerts Union River Telephone Company to outbound calls where the calling number has a poor reputation is invalid, unallocated, or on a Do Not originate list.
  - b. Union River Telephone Company uses a third-party analytics vendor TNSI know the carriers from which it receive traffic and has confirmed that those carriers are listed on the Robocall Mitigation Database.
4. Union River Telephone Company has taken the following steps to prevent illegal originating robocalling traffic:
  - a. Union River Telephone Company has procedures in place to prevent new & existing customers from using our network to originate illegal robocalls. Union River Telephone Company thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating a new service or making changes to the existing service.
5. Union River Telephone Company has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
  - a. Union River Telephone Company will contact the customer and inform them that we have detected possible robocalling from their line.

- b. Union River Telephone Company will continue to monitor the customer line and upon further detection of possible robocalling Union River Telephone Company can/will suspend the line.
- 6. Union River Telephone Company is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS solutions) non-IP call authentication solutions and serves as Union River Telephone Company's third-party representative on the ATIS Non-IP taskforce working group.