

Inter-Community Telephone. Robocall Mitigation Plan (RMP)

This document provides details on Inter-Community Telephone (ICTC) robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

ICTC, Operating Company Number 1616, 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).

ICTC provides local service to under 14,000 customers, fewer than 100,000 voice subscriber lines.

ICTC's non-IP network is connected to carriers that do not support IP connectivity; therefore, ICTC cannot upgrade the Non-IP connections to IP connectivity.

ICTC also originates calls via SIP connections within its network. ICTC is registered with the STI-PA as an authorized provider in the STIR SHAKEN eco-system. ICTC has implemented the STIR/SHAKEN authentication framework on the IP portion of its network and calls it originates on that portion of its network are signed with the ICTC certificate.

Robocall Mitigation Plan

All voice traffic that originates on ICTC's network is subject to the following Robocall Mitigation Plan designed to mitigate illegal and illegitimate robocalls.

Real-time Controls and Configurations

ICTC blocks all unassigned, unallocated, and unused numbers assigned to ICTC Communications. In addition, malformed or numbers not compliant with the North American Numbering Plan are blocked from originating on the network. ICTC requires all calling parties to provide caller ID numbers that have been verified as owned Direct Number (DN) or the entity has communicated a legitimate right to use.

ICTC Call Analytics utilizes a third-party service, TNSI's Negative Reputation Telephone Number Monitoring, to identify calling pattern irregularities for further investigation of potential robocall violations.

Monitoring and Service Performance

ICTC actively monitors all customer TDM Primary Rate Interface (PRI) and customer Session Initiated Protocol (SIP) trunks and reports on all traffic. High channel utilization and high calls per minute are flagged for review. Reports are generated nightly and reviewed by a Network Operations Center, with escalation to Engineering as necessary, and Business Sales for customer communication if required.

Acceptable Use of ICTC's Service

ICTC Communications has a telecommunications tariff on file with the North Dakota Public Service Commission which prohibits the use of ICTC's service for unlawful purposes and provides limitations on use of voice service for lawful purposes only.

Enforcement

If it is determined an ICTC customer is in violation of ICTC's acceptable use policy in any part of its network, ICTC will either warn the customer to stop such practices or discontinue their service.

Customer Identification and Verification (Know Your Customer Procedures)

ICTC requires new subscribers and subscribers who change existing accounts to provide photo identification or other valid identification to verify customers are legitimate and will use ICTC services for all legal means. Additionally, personally identifiable questions may be asked to provide additional security on each account.

Business customers are required to provide valid identification of taxation status and corporate structure. Additional security questions may be required to verify each account. Any contracts are executed by an authorized representative of the company.

Upstream Provider Knowledge

ICTC knows all carriers from which it receives traffic. ICTC has confirmed that all carriers in which ICTC exchanges traffic are listed in the Robocall Mitigation Database.

ICTC has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigation illegal robocalls.

ICTC does not directly receive traffic from any foreign originating or intermediate provider. No provider uses ICTC's network to carry or process a high volume of illegal traffic.

Reaction and Response (Traceback)

ICTC is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from the network. ICTC will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within twenty-four (24) hours.