

Robocall Mitigation Plan of East Kentucky Network, LLC d/b/a Appalachian Wireless

East Kentucky Network, LLC d/b/a Appalachian Wireless (“Appalachian Wireless”) has adopted and implemented this Robocall Mitigation Plan (“RMP”) pursuant to 47 C.F.R. § 64.6305. Appalachian Wireless is a rural wireless carrier serving twenty-five counties in Kentucky, one county in West Virginia, and three counties in Virginia. In order to comply with legal requirements and attempt to prevent its network from being used to originate unlawful robocalls, Appalachian Wireless has adopted the measures described herein.

Partial Implementation of STIR/SHAKEN

In order to comply with its obligations under 47 C.F.R. § 64.6301, Appalachian Wireless has contracted with a trusted vendor to implement STIR/SHAKEN on the IP portion of its network. Appalachian Wireless was in compliance with STIR/SHAKEN implementation requirements for the IP portion of its network prior to June 30, 2021, and will maintain compliance.

With respect to the non-IP portion of its network, Appalachian Wireless relies upon the continuing extension provided under 47 C.F.R. § 64.6304(d). As a condition of said extension, Appalachian Wireless will maintain and be ready, upon request by the Commission, to provide documented proof that it is participating, either on its own or through a representative including third-party representatives, as a member of a working group, industry standards group or consortium that is working to develop a non-IP caller identification authentication solution, or actively testing such a solution. (47 C.F.R. § 64.6303(b)).

Traceback Requests

Appalachian Wireless will respond fully to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours of receipt as described under 47 C.F.R. § 64.1200(n)(1). Appalachian Wireless will cooperate fully with such entities in investigating and stopping any illegal robocallers that use its services to carry or process calls.

All traceback requests should be sent to: compliance@ekn.com and switchtech@ekn.com.

Robocall Mitigation

Appalachian Wireless has implemented affirmative measures intended to prevent new and renewing customers from using Appalachian Wireless’s network to originate illegal calls, including knowing its customers, knowing its immediate upstream providers, and exercising due diligence in ensuring that its services are not used to originate illegal calls. Specifically, practices intended to mitigate the risk of originating illegal calls include the following:

- **Vetting Customers**

Appalachian Wireless takes reasonable steps to know its customers. Individual account holders must show proof of identity with an address in Appalachian Wireless’ service area. With respect

to business accounts, entities are typically vetted and validated through records publicly available from the Secretary of State and by other appropriate means. Because of Appalachian Wireless' limited service area and the close-knit communities it serves, account executives are typically able to gain personal knowledge of their customers' business activities and representatives.

- [Vetting Upstream Providers](#)

Appalachian Wireless has a limited number of immediate upstream providers and verifies that each one is registered in the Robocall Mitigation Database. Appalachian Wireless maintains information concerning the business location, contact person, FEIN, nature of the provider's business, and other information about each immediate upstream provider.

- [Analytics](#)

Appalachian Wireless is working with a trusted vendor, Transaction Network Services, Inc. ("TNS"), to analyze call traffic and identify any suspicious activity. Utilizing the TNS Call Guardian Platform, Appalachian Wireless monitors traffic patterns and blocks certain calls as required under 47 C.F.R. § 64.1200(o). Appalachian Wireless will also use the data from traffic monitoring to determine whether other permissible call blocking should be adopted and the most fitting parameters for such a program. Appalachian Wireless has adopted a call labelling program, utilizing the services of TNS.

- [Contractual Measures](#)

Appalachian Wireless' service terms and conditions expressly state that services may not be used for unlawful and abusive purposes and that any unlawful use may result in immediate termination. Should Appalachian Wireless become aware that any customer is using its services for unlawful purposes, Appalachian Wireless will rely upon such contractual provisions to take appropriate action.