

Chibardun Telephone Cooperative, Inc. ROBOCALL MITIGATION PROGRAM

Chibardun Telephone Cooperative, Inc. dba Mosaic Technologies (Chibardun), OCN 0861, is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Chibardun provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Chibardun's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), Chibardun is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. Chibardun's non-IP network is connected to carriers that do not support IP connectivity, therefore, Chibardun cannot upgrade its Non-IP network to IP.

Chibardun's network also has IP-portions which originates calls via SIP connections to other carriers. Chibardun has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Chibardun has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network with the Chibardun certificate.

Robocall Mitigation Program

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

Call Analytics

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

Investigation

Chibardun investigates calls identified by JSI, LLC as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Chibardun has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Chibardun 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 Chibardun customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Chibardun will either warn the customer to stop such practices or terminate their service as allowed per Chibardun policy.

Know your Customer

Chibardun has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Chibardun 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.

Residential customers are asked to provide their full name, address (physical and mailing, if different), phone number, email, and establish a security question, and a password. Chibardun also requires a photo ID for all new customers requesting voice service.

Business customers are asked to provide their full name, full names of authorized representative(s) on the business account, address (physical and mailing, if different), phone number, email, and establish a security question, and a password. To initiate an account change, a customer's authorized representative must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the telephone number they provided at account setup and ask to speak to an authorized representative(s) on the account.

Upstream Provider Knowledge

Chibardun knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Chibardun has the ability to monitor incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity and could notify the upstream carriers of any such traffic and warn the carriers that if the traffic does not cease, the calls may be blocked from entering Chibardun's network. In addition, Chibardun is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Chibardun 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. Chibardun commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.