

CTC Telcom, Inc.
ROBOCALL MITIGATION PROGRAM

CTC Telcom, Inc. dba Mosaic Technologies (CTC Telcom), OCN 7998, 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).

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

Consistent with § 64.6303 (a)(1), CTC Telcom 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. CTC Telcom's non-IP network is connected to carriers that do not support IP connectivity, therefore, CTC Telcom cannot upgrade its Non-IP network to IP.

CTC Telcom's network also has IP-portions which originates calls via SIP connections to other carriers. CTC Telcom has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. CTC Telcom 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 CTC Telcom certificate.

Robocall Mitigation Program

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

Call Analytics

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

Investigation

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

Know your Customer

CTC Telcom has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. CTC Telcom 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. CTC Telcom 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 number they provided at account setup and ask to speak to an authorized representative(s) on the account.

Upstream Provider Knowledge

CTC Telcom knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. CTC Telcom 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 CTC Telcom's network. In addition, CTC Telcom is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

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