

Lipan Telephone Company ROBOCALL MITIGATION PROGRAM

Lipan Telephone Company (Lipan), OCN 2105, 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). Lipan is 100% non-IP.

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

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

Robocall Mitigation Program

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

Call Analytics

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

Investigation

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

Know your Customer

Lipan has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Lipan 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. Lipan also requires a photo ID for all new customers requesting voice service.

Business customers are asked to provide their full business name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password.

Upstream Provider Knowledge

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

Traceback

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