

Robocall Mitigation Program - The Oklahoma Companies

This RMP covers the following entities which are referenced through this RMP as the Oklahoma Companies.

Company Name	OCN
Oklahoma Western Telephone Company	2014
Oklahoma Western Telephone Company d/b/a Oklahoma Western Cellular Southern Plains Cable, LLC	9304 and 983B

The Oklahoma Companies are eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as small voice service providers (§64.6304 (a)(2) that have non-IP portions within its network §64.6304(d).

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

The networks of The Oklahoma Companies also have IP-portions which originate calls via SIP connections to other carriers. Medicine Park Telephone Company is registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. IP calls originating on the networks of The Oklahoma Companies are signed with the Medicine Park certificate.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps the Oklahoma Companies have taken to avoid originating illegal robocall traffic.

Customer Inability to Spoof Caller ID: All customers of the Oklahoma Companies are only able to originate calls from a number that identifies in the companies' switches as a number that has been assigned to them. This prevents the Oklahoma Companies' customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on the networks.

1. Network Monitoring:

The Oklahoma Companies use call analytics provided by a TNS. The Oklahoma Companies use TNS' Call Guardian call analytics service. TNS Call Guardian's call analytics solution uses cross-carrier real-time call events combined with crowdsourced data to create accurate and comprehensive reputation profiles differentiating legitimate users of telecommunications services from abusive, fraudulent, and unlawful users.

Call Guardian employs powerful data analytics and call treatment options for a complete solution:

☐ Data Analytics

The service provides access to a dynamic data set of negatively scored telephone numbers within the Call Guardian Data Analytics Engine.

☐ Call Treatment

Call treatment is determined within the Call Guardian Authentication Hub (CGAH). Based on the resulting score of the call, various options are available – whether to block, redirect, or provide a warning to the subscriber.

Data Analytics

The Call Guardian Data Analytics Engine is an industry leading call analytics solution with over 1.5B records and growing. Call Guardian uses a complex machine learning algorithm and various data sources to:

- ☐ Identify robocalls
- ☐ Differentiate between wanted and unwanted calls
- ☐ Identify spoofing events
- ☐ Identify with certainty which calls should be blocked

The Oklahoma Companies' billing vendors, as well as its underlying long-distance carrier, will notify Oklahoma if they observe excessive call volumes or suspicious call patterns originating on a Oklahoma customer's line. If Oklahoma is notified of such an issue, we would contact the customer to investigate the purpose of the calls. If, upon investigation, it was determined the customer was using their voice service to make illegal robocalls, Oklahoma will act quickly to put an end to the unlawful activity, and may suspend or terminate the customer's service as appropriate.

In addition, the Oklahoma Companies' Network Operations Center (NOC) generate CDR reports to review and identify if suspicious traffic is generated by customers. Also, only originating calls from end users assigned telephone numbers by the Oklahoma Companies and / or ported into the Oklahoma Companies are listed in subscriber records to originate traffic. The Oklahoma Companies only build translations in the switch for those assigned telephone numbers.

2. *Know-Your-Customer Policy*: The Oklahoma Companies business customers are small businesses that are physically located in the Oklahoma Companies service territories. As a result, the Oklahoma Companies have never received a request for high-volume origination services. However, were any of the Oklahoma Companies to ever receive such a request, we would thoroughly vet the identity of the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.
3. *Know Your Upstream Provider*
The Oklahoma Companies know all the carriers from which they receive traffic and have confirmed that all of the carriers are listed in the Robocall Mitigation Database. The Oklahoma Companies monitor 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 the networks of the Oklahoma Companies. In addition, the Oklahoma Companies are now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

4. Traceback

The Oklahoma Companies commit 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. The Oklahoma Companies commit to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.