



NATIVE AMERICAN TELECOM – PINE RIDGE, LLC

10 White Tail Deer Road, Pine Ridge, South Dakota 57770

Telephone: 605-562-2223

STIR/SHAKEN Implementation

Revised Robocall Mitigation

October 23, 2024

Native American Telecom – Pine Ridge, LLC (“NATPR”) is a small rural telecommunications and broadband service provider serving the Pine Ridge Indian reservation in South Dakota. NATPR has fewer than 100,000 voice service subscriber lines counting all residential and business lines and mobile phones, including all affiliated company lines, and therefore is exempt from the requirements of 47 C.F.R. § 64.6301, as provided for in 47 C.F.R. § 64.6304(a).¹

NATPR is taking steps to protect against illegal, fraudulent, and other traffic that does not comply with applicable STIR/SHAKIN and Robocall requirements by implementing the following measures:

1. Monitoring all telecommunications traffic for suspicious call patterns and call originations that do not match call detail records or is otherwise suspect.
 - a. NATPR has implemented systems to monitor and report traffic on its network that flags suspicious traffic patterns associated with illegal robocalls or other unlawful usage. To the extent any suspicious traffic is detected, NATPR takes immediate action, including suspension of traffic on its network until any issues are resolved.

¹ NATPR is not affiliated with any other telecommunications provider subject to the STIR/SHAKIN and Robocall requirements.

2. Responding to traceback requests from regulatory authorities, civil and criminal law enforcement, or the Industry Traceback Consortium.
 - a. NATPR routinely works with regulatory and judicial authorities to address issues and will, likewise, work with the Industry Traceback Consortium to address and resolve suspicious traffic.
3. Taking steps to effectively mitigate illegal traffic when it receives notification of such traffic from regulatory or judicial authorities.
 - a. NATPR works with its customers and telecommunications partners to ensure no illegal or unlawful traffic is carried on its network.
4. Implementing effective measures to prevent new and current customers from using NATPR's network to originate illegal calls.
 - a. NATPR is constantly evaluating and implementing new technology to identify suspicious traffic patterns and take appropriate action based upon the constantly changing traffic types and patterns.

Principals, Affiliates, Subsidiaries, and Parent Companies

NATPR is an independent company with no affiliates and subsidiaries. NATPR is wholly-owned by Native American Telecom Enterprise, LLC, which, in turn, is owned by individual investors. NATPR is member managed by one of the investors, Gene DeJordy, who serves as the company's Chief Executive Officer, responsible for the day-to-day operations of the company.

NATPR Point of Contact for STIR/SHAKIN and Robcalls:

NATPR Network Operations
10 White Tail Deer Road
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Telephone: 605-562-2223
E-Mail: gene@NativeAmericanTelecom.com

NATPR Escalation Point of Contact:

Gene DeJordy
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47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), and (f)(2)(ii) Information

NATPR addresses the following FCC requirements:

(1) The specific reasonable steps taken to avoid originating, carrying, or processing illegal robocall traffic as part of NATPR’s robocall mitigation program.

NATPR takes the following specific steps to avoid originating, carrying or processing illegal robocall traffic

- a. NATPR limits capacity appropriate to the customer size and business needs;
- b. NATPR reviews all numbers to ensure valued NPANXX combinations;
- c. Each NATPR customer and carrier has a completed and verified Know Your Customer/Carrier (“KYC”) profile that is validated and verified on a continuous basis.
- d. NATPR monitors telephone numbers and implements safeguards to protect against unwanted and unauthorized calls and telecommunication traffic. NATPR continuously evaluates additional mechanisms, internally and externally, to ensure only approved and authorized traffic is carried on its network.

(2) How NATPR complies with its obligation to know its customers and/or upstream providers.

NATPR serves a small, defined residential and business market and all potential customers go through a stringent vetting process prior to becoming authorized customers of NATPR. Similarly, NATPR only accepts traffic from carriers with approved FCC RoboCall Mitigation Plans. NATPR does not allow automated sign ups, automated number assignments/requests, or automated capacity allocation or increases. Each and every carrier and

customer goes through a vetting process before being able to send/receive traffic on NATPR's network.

(3) The analytics system used to identify and block illegal traffic.

NATPR has developed an internal traffic analytical system that monitors calls on a real-time basis to identify calls and telecommunications traffic that meet defined profiles and authorized origination and termination identities. Specifically, we work with our customers to identify approved call origination points, numbers, and traffic types. Traffic that does not meet approved origination points, numbers, and traffic types are identified and subject to further verification and validation. NATPR analyzes all call detail records ("CDRs") to identify potential issues, including RoboCalls and other unwanted or unauthorized traffic. NATPR is able to block or restrict calls that do not meet defined profiles and authorized origination and termination identities.

(4) Whether NATPR uses any third-party analytics vendor(s) and the name(s) of such vendor(s).

NATPR has developed an internally developed traffic filter and monitoring system to comply with the FCC robocall requirements. NATPR does not currently use any third party analytics vendors.