

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, **Northeast Communications of Wisconsin, Inc.**, on behalf of itself and its subsidiaries listed in Appendix A, submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **Northeast Communications of Wisconsin, Inc.** has in place to mitigate illegal robocalls as of February 21, 2024. **Northeast Communications of Wisconsin, Inc.** may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

STIR/SHAKEN Implementation

Northeast Communications of Wisconsin, Inc. will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally. **Northeast Communications of Wisconsin, Inc.** certifies that all calls originated on its network are subject to a robocall mitigation program that meets the requirements set forth in the *Sixth Caller ID Authentication Report and Order*. **Northeast Communications of Wisconsin, Inc.** is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users and certify that it has not been prohibited from filing in the Robocall Mitigation Database nor are subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing and provide information concerning any such actions or investigations.

Northeast Communications of Wisconsin, Inc. has implemented STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

Northeast Communications of Wisconsin, Inc. expects to implement this solution in the IP portions of its network by October 2025.

- ☐ My traffic is fully attested.
- ☒ My traffic is partially attested.
- ☐ None of my traffic is yet attested, however I have implemented the Robocall Mitigation Plan outlined below.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network as of February 21, 2024. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and

procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. **Northeast Communications of Wisconsin, Inc.** is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and **Northeast Communications of Wisconsin, Inc.** has not received information suggesting that robocalls are originated on its network. Therefore, **Northeast Communications of Wisconsin, Inc.** does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: **Northeast Communications of Wisconsin, Inc.**, to the best of its abilities and in reliance on the external resources available to it, conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, that it is registered with the state. The Company confirms the customer's service address for all customers.

- **Northeast Communications of Wisconsin, Inc.** verifies customer's credit history and business reputation prior to providing service.
- **Northeast Communications of Wisconsin, Inc.** verifies customer information when contracts are renewed, or services are added.
- **Northeast Communications of Wisconsin, Inc.** has policies that guide the circumstances by which it will deny, suspend or terminate service to a customer.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **Northeast Communications of Wisconsin, Inc.** has in place an enforceable terms of use and/or an acceptable use policy. **Northeast Communications of Wisconsin, Inc.** also has in place policies designed to detect and prevent fraudulent traffic on its network.
- **Northeast Communications of Wisconsin, Inc.** has confirmed all of its connected carriers (upstream providers) are listed in the Robocall Mitigation Database and have reviewed their Robocall Mitigation Plans. **Northeast Communications of Wisconsin, Inc.** works closely with upstream providers to mitigate illegal robocalls by working directly with their Network Operations teams.
- **Northeast Communications of Wisconsin, Inc.** uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **Northeast Communications of Wisconsin, Inc.** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken,

Northeast Communications of Wisconsin, Inc. can suspend and/or terminate service to the customer.

- **Northeast Communications of Wisconsin, Inc.** blocks the following types of calls by default:

☒ Calls originating from invalid numbers per the FCC's *2017 Call Blocking Order*¹

☒ Calls from DNO numbers as per the FCC's *2017 Call Blocking Order*²

- **Northeast Communications of Wisconsin, Inc.** also blocks the following types of calls:
 - As we convert our traffic from TDM to SIP, we will use TNS data analytic tools to analyze and handle suspicious traffic.
 - Blocking calls labeled as minus 4s.
 - Sending calls labeled minus 3s to voicemail.
 - SPAM notification sent for calls labeled minus 2s.

Responding to Traceback Requests

- **Northeast Communications of Wisconsin, Inc.** has designated an individual, and a backup person to that individual, as a dedicated point of contact for addressing traceback requests. It either has provided the Industry Traceback Group ("ITG") with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- **Northeast Communications of Wisconsin, Inc.** will respond promptly to inquiries received from the ITG. If a pattern of questionable activity is detected, **Northeast Communications of Wisconsin, Inc.** will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

Northeast Communications of Wisconsin, Inc. will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **Northeast Communications of Wisconsin, Inc.** will:

- Respond to valid law enforcement requests;

¹ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, WC Docket No. 17-97, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9706 (2017) (*2017 Call Blocking Order*)

² *Id.*

- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Northeast Communications of Wisconsin, Inc. has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. **Northeast Communications of Wisconsin, Inc.** is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Sincerely,

Rick Brooks
CTO & VP of Engineering

Appendix A

Northeast Communications of Wisconsin, Inc. (FRN 0002706190) Subsidiaries

Subsidiary	FRN	OCN
Borderland Communications LLC	0002331846	0030
Bayland Telephone LLC	0003749736	8614, 0925
Lakefield Telephone Company	0003773785	0148, 0896
Nsightel Wireless LLC	0004059523	5564, 6692, 9759
NetLec, LLC	0004320529	6183
Brown County CLEC LLC	0004320545	N/A
Northeast Telephone Company LLC	0004322178	0920
Niagara Telephone Company	0023331812	0938