



Calaveras Telephone Company Robocall Mitigation Plan

Background

Calaveras Telephone Company is a voice provider covering California Communities in western Calaveras County. Our subscriber base is small with roughly 2,700 lines that are largely residential. Being a small service provider allows us to better understand how our subscribers are using our voice services.

Type of Extensions Received Under 47 C.F.R. §64.6304

Calaveras has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC's rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d)).

Robocall Mitigation Plan

All voice traffic that originates on the Calaveras network is subject to the following Robocall Mitigation Plan.

Calaveras has contracted with TNS to provide robocall analytics and reputation scoring on all its network's outbound traffic. TNS' analytics will identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Calaveras has access to the TNS portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs.

Calaveras will examine the call analytics reports and investigate and identify the source of the calls as unlawful or legitimate.



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STIR/SHAKEN Implementation

As of June 7th, 2023, Calaveras has implemented STIR/SHAKEN in the IP portions of its network and has been authenticating or verifying caller ID information for SIP calls that originate and terminate on those portions of the network. Calaveras still has portions of its network that are non-IP and cannot support STIR/SHAKEN. Calaveras will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol has been fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

Calaveras 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. Calaveras has contacted its non-IP connected carrier(AT&T) and requested to convert the Non-IP connections to IP. The carrier stated it cannot support IP connections at this time.

