

The Champlain Telephone Company Robocall Mitigation Program

The Champlain Telephone Company (Champlain), Operating Company Number (0077), is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Champlain is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Champlain's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

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

Champlain also originates calls via SIP connections within its network. Champlain has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Champlain has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of its network.

ROBOCALL MITIGATION PROGRAM

Champlain has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network. All calls that originate on Champlain's network are subject to the described robocall mitigation program.

Champlain has contracted with Neustar to provide robocall analytics and reputation scoring of our network's outbound traffic. Neustar's analytics 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 reported by other carriers.

Champlain has access to the vendor's portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Champlain can also receive reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our company's traffic.

Champlain examine the reports and investigate and identify the source of the calls as bad or legitimate.

Enforcement

If it is determined a caller is originating prohibited unlawful robocalls on our network, Champlain will either warn the customer to stop or terminate their service as allowed per Champlain's policies that define the circumstances by which Champlain will suspend or terminate service to a customer.

Customer Vetting

Champlain has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Champlain 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.

Upstream Provider Knowledge

Champlain knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Champlain, via its call analytics vendor, monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Champlain's network. Champlain does not directly receive traffic from any foreign originating or intermediate provider. No provider is using Champlain's network to carry or process a high volume of illegal traffic. In addition, Champlain is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Traceback

Champlain is committed 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. Champlain will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.