

Robocall Mitigation Policy

Date	On Behalf of	Change Summary
December 17, 2024	Nortec Communications, Inc.	Initial Version (1.0)

I. Overview

This mitigation plan is submitted on behalf of Nortec Communications, Inc. (“Nortec”), a provider of UCaas and CCaas to businesses, primarily in Minnesota. Nortec is a small voice service provider with SIP services and has partnered with a trusted provider to implement STIR/SHAKEN in parts of its network as it is realistically able to do so and has implemented this policy for those portions of its network not yet compliant.

II. Certification

Nortec certifies that all calls that originate from its network are subject to Nortec’s Robocall Mitigation Program. Furthermore, prior certifications (if any) have not been removed by Commission action and Nortec has not been prohibited from filing in the RMD. Nortec has not implemented STIR/SHAKEN on the Internet Protocol portions of its network as this is being handled by our upstream carrier, Sinch (Inteliquent).

III. Nortec Robocall Mitigation Policy

- a. Nortec Communications, Inc. end user services are subject to restrictions contained in its terms of service (“TOS”) requirements. Its existing TOS prohibits activities normally associated with Robocalling including, but not limited to:
 - i. Providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call
 - ii. Violating any applicable local, state, or federal law; using the Nortec service to engage in or in connection with fraudulent activities
 - iii. Nortec’s end users are notified that CWT may take action up to suspension or termination of service for violation of the TOS.

b. Know Your Customer

Nortec utilizes the mitigation technique of “Know Your Customer.” Nortec is a small, long-established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities. Nortec has set a call path level based on its average customer size. The level – referred to as “External Call Limit” – is subject to change. Nortec screens new customers requesting service at or above large volume calling capability levels:

- i. We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- ii. Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- iii. We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- iv. A Nortec representative may visit the premise(s) of the business to verify the number of users at the location is appropriate for the volume of calling

c. Analytics

Nortec’s internal systems provide real-time analytics to provide staff with visibility to call traffic to alert of unusual call traffic. Furthermore, alerts automatically provide to our NOC for peaks in call traffic above set thresholds.

Nortec uses a single upstream provider.

d. Responsible Person

All robocall mitigation-related issues, are handled by:

Steven K Myhre – President and CEO
1850 E 121st Street
Suite 105
Burnsville, MN 55337
stevem@norteccommunications.com
952-215-0201

e. Other Information

- i. Nortec provides UCaaS and CCaaS service to customers including SIP IP connectivity to the PSTN.
- ii. STIR/SHAKEN is implemented by the upstream carrier, Sinch (Inteliquent).
- iii. Nortec has not been subject to a Commission or other law enforcement agency action or investigation
- iv. Nortec is committed to respond fully to traceback requests within 24 hours.