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Richmond Telephone Company Robocall Mitigation Plan

Richmond Telephone Company is classified as a small voice service provider and has been exempted from the requirements of 47 CFR 64.6301 through June 30, 2023, per 47 CFR 64.6304 – Extension of implementation deadline.

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

Richmond Telephone Company agrees to comply with efforts to traceback the source of suspected robocalls.

- We cooperate with traceback requests received directly from carriers, industry associations, and law enforcement.
- Call records are created for all calls and are searchable.

Richmond Telephone is implementing the following steps to mitigate and avoid illegal robocall traffic originating from its network:

- All residential and business lines are able to place only one call at a time.
- All residential and business lines are only able to place calls originating from their own phone number.
- Only numbers residing in our switch are assigned to residential and business lines.
- Richmond Telephone does not sell voice services outside of its study area boundary.
- Richmond Telephone monitors voice traffic to ensure originating traffic is valid.
- Richmond Telephone is also in the process of implementing mitigation requirements with its software vendor.

Richmond Telephone is an active member of the National Exchange Carrier's Association (NECA), which is a member of the ATIS Non-IP Call Authentication Task Force. Richmond Telephone also works closely with Ribbon Communications, who also is a member of this Task Force, which has been founded to continually make innovations to prevent Robocalls.

Richmond Telephone's majority of its voice call traffic travels over its TDM trunks but does employ some SIP to leave and enter its network. As such, this prevents us from implementing STIR/SHAKEN for our voice traffic at this time. If Richmond determines that illegal traffic originated from one of their customers they will immediately notify and inform that customer and take steps to prevent that customer from originating illegal robocalls. To that end, Richmond Telephone submits this robocall mitigation plan, which is designed to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187).

Richmond Telephone Company Robocall Mitigation Plan

This document provides details on Richmond Telephone Company's robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

Richmond Telephone Company, Operating Company Number 0037, 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).

Richmond Telephone Company provides local service to 488 customers, fewer than 100,000 voice subscriber lines. All customers are served on the non-IP portions of the network which relies on TDM technology that cannot initiate, maintain, or terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension §64.6303(a)(2), Richmond Telephone is an active member of the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Robocall Mitigation Plan

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

Reasonable Steps

Richmond Telephone monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are analyzed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short time frame
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Richmond retains the originating and terminating call detail usage records for a minimum of 36 months.

Investigation

Richmond investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls.

As of this filing Richmond has not had any originating robocalls detected in its network by the internal analytics. Nor has Richmond received any complaints from its customers.

Enforcement

If it is determined that a Richmond customer is in violation of its acceptable use policy in any part of its network, Richmond will either warn the customer to stop such practices or terminate their service.

Know Your Customer

Richmond has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Richmond vets all residential and business customers, validates their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

Contractual Provisions with End-users

All new customers acknowledge a statement on the service application which states users are prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

Upstream Provider Knowledge

Richmond knows all carriers from which it receives traffic. Richmond has confirmed that all carriers in which Richmond exchanges traffic are listed in the Robocall Mitigation Database.

Richmond has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Roll In the Call Chain

Richmond Telephone is a voice service provider without the STIR/SHAKEN obligation on the Non-IP portion of its network because Richmond relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Traceback

Richmond is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. Richmond 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 24 hours.

Robocall Mitigation Database Eligibility

Richmond has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Richmond has not been prohibited from filing in the Robocall Mitigation Database (RMD).