

Robocall Mitigation Certification Filing

Prepared September 23, 2021

Voice Service Provider Information

Business name(s):	Wabash Independent Networks, Inc
Primary address:	14415 Hwy 45 South Louisville, IL 62858
Other business names in use:	
All business names previously used:	N/A
Is this a foreign voice service provider (Yes/No)?	No

Point of Contact for Robocall Mitigation

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Title:	Network Operations Manager
Department:	Network
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STIR/SHAKEN Extensions

Wabash Independent Networks, Inc. (WIN) operates under 5000 voice access lines and is eligible for, and taking the STIR/SHAKEN implementation extension received under 47 CFR § 64.6304.

Robocall Mitigation Plan

Some of the voice traffic Wabash originates on our network is authenticated with STIR/SHAKEN. **Since 2019 WIN has successfully authenticated over 1.6 million calls on our rural live-production voice network using SHAKEN Out-of-Band technology.** However, while Out-of-Band technology authenticates and verifies calls with the highest reliability, WIN is subject to the extension above and a robocall mitigation plan submission because of resistance from the communications industry, resulting in no affordable rural IP connectivity, and Out-of-Band technology not being recognized as an industry standard, even though its currently being reliably used in live call production today.

Industry involvement in STIR/SHAKEN initiatives and development

WIN serves actively on the STI-GA Board of Directors, STI-GA Technical Committee, and also a member of the NIPCA Committee (ATIS Non-IP Standards)

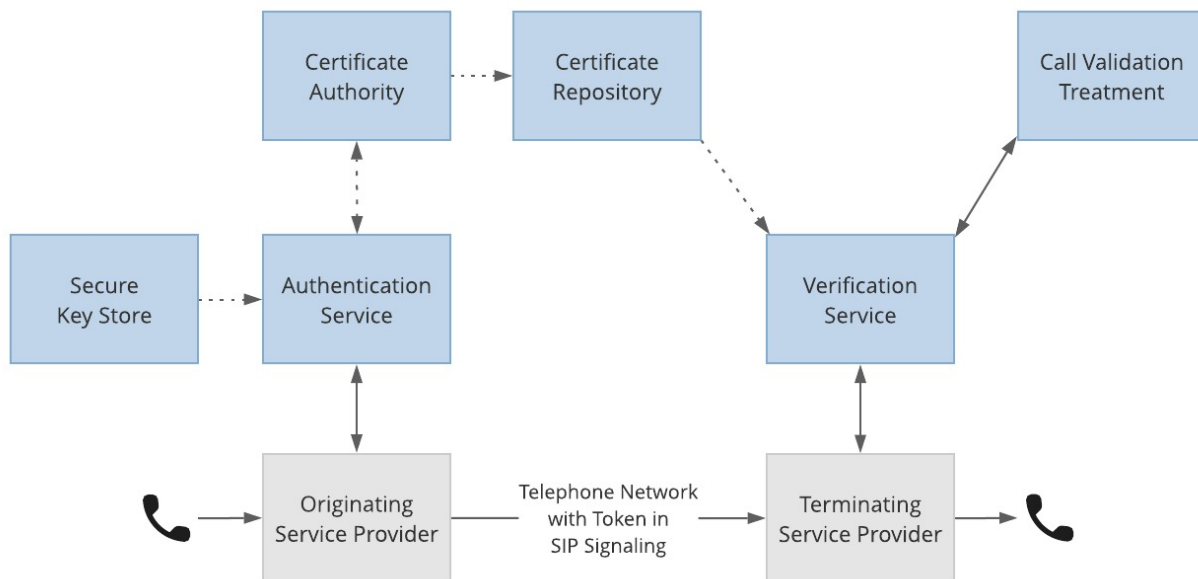
STIR/SHAKEN Call Authentication

WIN uses STIR/SHAKEN to authenticate caller ID information for originating IP to IP calls, and Out-of-Band SHAKEN technology to authenticate caller ID information for non-IP calls.

WIN's STIR/SHAKEN deployment adheres to the three ATIS standards that are the foundation of STIR/SHAKEN:

1. **ATIS-1000074-E**, *Errata to ATIS Standard on Signature-based Handling of Asserted information using toKENs (SHAKEN)*
2. **ATIS-1000080**, *ATIS Standard on Signature-based Handling of Asserted information using toKENs (SHAKEN): Governance Model and Certificate Management*
3. **ATIS-1000084**, *Errata to ATIS Technical Report on Operational and Management Considerations for SHAKEN STI Certification Authorities and Policy Administrators*

Our STIR/SHAKEN deployment includes, but is not limited to, the components depicted in blue in this illustration and described in ATIS-1000074-E:



WIN has registered with the STI Policy Administrator and is an approved service provider. We have paid for our registration and have received Service Provider Code tokens.

WIN receives SHAKEN certificates from TransNexus, an approved STI Certification Authority.

WIN's STIR/SHAKEN deployment is live in production mode. We use it to authenticate and sign calls we originate in the portions of our network that support it and verify signed calls we receive that support STIR/SHAKEN.

Know Your Customer

WIN follows and adheres to section three of the "Best Practices for the Implementation of Call Authentication Frameworks" for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

WIN has official security officers appointed to respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, and will cooperate in investigating and stopping any illegal ROBO caller(s) originating illegal calls on our networks. WIN commits to responding to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within twenty-four(24) hours .

Policing Call Volumes

WIN has less than 5000 voice subscribers. Per day, our voice traffic levels and quantities are relatively low and stable in volume and easily monitored for a change in that volume. If a bad actor(s) would begin originating illegal calls on our network of any volume, we would easily detect the change in call volume and immediately investigate those calls to see where they originated from. If we determine that the calls are unlawful, then we either warn them to stop or terminate their service as appropriate. This will help prevent new and old subscribers from using our network from originating illegal calls.

Do Not Call Registry and ROBO Call Education

On a regular basis, WIN will notify our subscribers on the benefits and use of the Do Not Call Registry. And how to avoid being victims of scams and deception, and provide frequent ROBO call education through common marketing channels.

Service Agreements Modification

WIN has modified its service agreements to include the language that WIN prohibits the use of telephone numbers for illegal purposes. WIN will enforce our service agreements and report compromised telephone numbers to the FTC and FCC.