



STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP) CERTIFICATION

Pursuant to 47 C.F.R. § 64.6305 and FCC Order DA 24-1235, **ASTCA** submits this report and certification on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This certification describes the status of its implementation of STIR/SHAKEN and the practices and procedures **ASTCA** has in place to mitigate illegal robocalls as of **December 12, 2024**. **ASTCA** may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

ASTCA regrets that an email issue led to missing the original notice to cure the certification. This has been resolved and **ASTCA** remains committed to meeting all of its reporting obligations. **ASTCA** has updated its certification below. The following tracks with the filing portal's requirements as released in January. This response should cure the certification deficiencies as **ASTCA** meets all its obligations as set forth earlier this year with full STIR/SHAKEN compliance and a Robocall Mitigation Plan designed to combat illegal robocalls.

ASTCA will update its filing in the portal accordingly but submits this in accordance with Order DA 24-1235. A hardcopy will also be sent to the FCC in addition to the email to the Enforcement Bureau.

Business Contact Information:

FCC FRN – 0001726488

Business Name: American Samoa Telecommunications Authority

Other Business Name: ASTCA ILEC, ASTCA IXC/Wireless

Previous Names: Office of Communications – American Samoa Government

Address: Aleki Sene Sr. Telecommunications Center, PO Box M, Pago Pago, AS 96799

Type of Provider: Voice Service Provider

Foreign Voice Service Provider: No

No principals, affiliates, subsidiaries and parent companies. No OCN.

Robocall Mitigation Point of Contact:

Virginia Tuiolosega

Director of Engineering

Technical Department

Aleki Sene Sr. Telecommunications Center

PO Box M, Pago Pago, AS 96799

Virginia.tuiolosega@astca.net

Ph.: (684) 733-9037

ASTCA

Post Office Box M

Pago Pago, American Samoa 96799

Connecting American Samoa to the World.



Tel +1 684.699.3000



www.astca.net



astca684

Robocall Mitigation Secondary Point of Contact:

Taialii Gagau

DCO

Technical Department

Aleki Sene Sr. Telecommunications Center

PO Box M, Pago Pago, AS 96799

Taialii.gagua@astca.net

Ph.: (684) 782-0095

Additional Information:

- Voice Service Provider with a STIR/SHAKEN implementation obligation serving end users.

ASTCA has **NOT** been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Voice Service Provider Certification:

Complete STIR/SHAKEN Implementation. **ASTCA** certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR 64.6305(a), which shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. **ASTCA** also certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has fully implemented the STIR/SHAKEN authentication framework across its network and all calls it originates are compliant with 47 CFR 64.6301(a)(1) and (2).

Robocall Mitigation Program Description:

STIR/SHAKEN Implementation

ASTCA is fully compliant with all conditions set forth in the FCC's 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

ATSCA has implemented STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

ASTCA has implemented this solution in the IP portions of its network as of June 30, 2023, the deadline given for small voice service providers. **ASTCA** traffic is fully attested. **ASTCA** authenticates unsigned calls.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. **ATSCA** is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and **ASTCA** has not received information suggesting that robocalls are originated on its network. Therefore, **ASTCA** does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: **ASTCA** conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- **ATSCA** verifies customer's credit history and business reputation prior to providing service.
- **ASTCA** verifies customer information when contracts are renewed or services are added.
- **ASTCA** verifies the customer's identity and their right to use the telephone number presented on calls.
- **ASTCA** has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Direct IP Intermediate Carrier Due Diligence: **ASTCA** takes appropriate steps to know the immediate service provider to ensure that the immediate upstream provider is not using it to carry or process a high volume of illegal traffic. **ASTCA** verifies that all immediate upstream providers are listed in the FCC Robocall Mitigation Database, monitors traffic patterns, and blocks non-compliant providers as necessary.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **ASTCA** uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **ASTCA** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, **ASTCA** can suspend and/or terminate service to the customer.
- **ASTCA** verifies that the direct intermediate carriers that are used by **ASTCA** are in the FCC RMD and does not accept traffic from intermediate carriers who are not in the RMD.
- **ASTCA** blocks the following types of calls by default:

Calls originating from invalid numbers per FCC Order **[2017 Call Blocking Order]**
Calls from DNO numbers as per FCC Order **[2017 Call Blocking Order]**

- **ASTCA** also blocks the following types of calls:
 - ✓ IP blacklisting on both ASTCA's border router and SBCs
 - ✓ As an originating service provider and/or intermediate carrier that is immediately downstream from a bad actor, will block traffic from the bad actors when notified by the Commission.

Responding to Traceback Requests

- **ASTCA** has designated an individual as a dedicated point of contact for addressing traceback requests and robocall mitigation-related issues, and a backup person to that individual. The required contact information is as follows:

Primary POC: Virginia Tuiolosega, Director of Engineering
 Virginia.tuiolosega@astca.net
 Ph.: (684) 733-9037

Secondary POC: Taialii Gagau, DCO
 Taialii.gagua@astca.net
 Ph.: (684) 782-0095

- **ASTCA** will respond within 24 hours of receipt of traceback request to inquiries received from the Commission, law enforcement and the industry traceback consortium. Furthermore, **ASTCA** will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls. If a pattern of questionable activity is detected, **ASTCA** will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

ASTCA will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **ASTCA** will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

ASTCA has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls.

ASTCA is pleased to play a role in that improvement and will continue the necessary work to protect our customers. **ASTCA** regrets that an issue with receiving the email notification from the FCC regarding the certification led to the delay and the subsequent order to which we are responding today. This issue has been resolved and **ASTCA** is committed to meeting all of its reporting and certification requirements.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct. Executed on December 19, 2024.

Chuck Leota
CEO