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Pursuant to 47 C.F.R. § 64.6305, **Progressive Rural Telephone Co-Op, Inc.** submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **Progressive Rural Telephone Co-Op, Inc.** has in place to mitigate illegal robocalls. **Progressive Rural Telephone Co-Op, Inc.** 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.

Progressive Rural Telephone Co-Op, Inc. 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).

Progressive Rural Telephone Co-Op, Inc registered with the STIR/SHAKEN Policy Administrator, obtained its own SPC token from the Policy Administrator, uses that token to generate a certificate with their Certificate Authority, and authenticates all its calls with that certificate.

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. 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. **Progressive Rural Telephone Co-Op, Inc.** is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and **Progressive Rural Telephone Co-Op, Inc.** has not received information suggesting that robocalls are originated on its network. Therefore, **Progressive Rural Telephone Co-Op, Inc.** does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: **Progressive Rural Telephone Co-Op, Inc.** conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, is incorporation documents. The Company confirms the customer's service address for all customers.

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

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **Progressive Rural Telephone Co-Op, Inc.** has in place an enforceable terms of use and/or an acceptable use policy. **Progressive Rural Telephone Co-Op, Inc.** also has in place policies designed to detect and prevent fraudulent traffic on its network.
- **Progressive Rural Telephone Co-Op, Inc.** uses **TNS Call Guardian** analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **Progressive Rural Telephone Co-Op, Inc.** 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, **Progressive Rural Telephone Co-Op, Inc.** can suspend and/or terminate service to the customer.
- **Progressive Rural Telephone Co-Op, Inc.** 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]**

Upstream Provider Knowledge

Progressive Rural Telephone Co-Op, Inc knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using **Progressive Rural Telephone Co-Op, Inc's** network to carry or process a high volume of illegal traffic. **Progressive Rural Telephone Co-Op, Inc** 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 and notified that, if the traffic does not cease, the calls may be blocked from entering **Progressive Rural Telephone Co-Op, Inc's** network. In addition, **Progressive Rural Telephone Co-Op, Inc** is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Responding to Traceback Requests

- Progressive Rural Telephone Co-Op, Inc commits 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. Progressive Rural Telephone Co-Op, Inc commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.
- **Progressive Rural Telephone Co-Op, Inc.** has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-rollback-group-itg/for-providers/>
- **Progressive Rural Telephone Co-Op, Inc.** will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, **Progressive Rural Telephone Co-Op, Inc.** 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

Progressive Rural Telephone Co-Op, Inc. will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **Progressive Rural Telephone Co-Op, Inc.** 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.

Progressive Rural Telephone Co-Op, Inc. 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. **Progressive Rural Telephone Co-Op, Inc.** is pleased to play a role in that improvement and will continue the necessary work to protect our customers.