

Canadian Valley Telephone Co ROBOCALL MITIGATION PLAN

Canadian Valley Telephone Co. (CVT), Operating Company Number 1974, 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).

CVT provides local service to fewer than 100,000 voice subscriber lines. Some CVT customers are served on the non-IP portions of CVT's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. CVT's non-IP network is connected to carriers that do not support IP connectivity; therefore , CVT cannot upgrade those Non-IP portions of its network to IP connectivity.

CVT also originates calls via SIP connections within its network. CVT has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. CVT has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of its network.

Robocall Mitigation Plan

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

Internal Traffic Monitoring & Analytics

CVT uses billing software and polled switch records to monitor originating voice traffic for suspicious or abnormal call volume or activity. The software and switch records provide detailed reports to help identify suspected illegal robocalls. CVT uses the reports and records to determine if the caller was attempting to originate unlawful robocalls.

Investigation

CVT promptly investigates calls identified as potential illegal robocalls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if CVT has any other reason to suspect illegal robocalling or spoofing is taking place over its network, CVT will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a CVT customer is using our network to fraudulently spoof calls or to originate illegal robocalls, CVT will immediately mitigate the illegal robocall traffic by either warning the customer to stop such practices or terminating their service as allowed per CVT policy.

Know your Customer

CVT has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. CVT thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), date of birth, phone number, email, and establish a security question, and a password. Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. CVT also requires a photo ID for all new customers requesting voice service.

Upstream Provider Knowledge

CVT knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. CVT has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. CVT 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 if the traffic does not cease, the calls may be blocked from entering CVT's network. In addition, CVT is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

CVT is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. CVT is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

CVT 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. CVT 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 twenty-four (24) hours.

Robocall Mitigation Database Eligibility

CVT has never been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling. CVT has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

CVT posts information on its website to educate customers on how to protect themselves from

becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.