



North Central Telephone Cooperative and North Central Communications RoboCall Mitigation Compliance with TRACED Act

Date	Author/Title	Change Summary
10/28/2024	Clint Carter, Director of Technology	Update to expand on actions taken to know our customers

This response is submitted on behalf of North Central Telephone Cooperative, an incumbent local exchange carrier in Kentucky and Tennessee and its wholly owned subsidiary, North Central Communications, a competitive service provider in Kentucky and Tennessee. The two companies share management and operations and shall be referred to as NCTC/NCC.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

NCTC/NCC 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).

NCTC/NCC is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as NCTC/NCC's third-party representative on the ATIS Non-IP taskforce working group.

Status of STIR/SHAKEN Implementation

NCTC/NCC has implemented authentication and verification with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls.

NCTC/NCC subscribes to Ribbon's STIR/SHAKEN as a Service which provides the company access to a complete STIR/SHAKEN solution. NCTC/NCC uses Ribbon's service for the Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functions. NCTC/NCC has its own STIR/SHAKEN certificate which is issued by Ribbon.

NCTC/NCC will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

II. Robocall Mitigation Plan

NCTC/NCC is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. NCTC/NCC uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network.

All carriers to which NCTC/NCC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of NCTC/NCC's end users.

Call Analytics

NCTC/NCC subscribes to Ribbon's Call Trust® Reputation Scoring service which provides per-call analytics to assess the likelihood that a call is being made with malicious intent. For each originating call attempt, Ribbon's Reputation Scoring service is engaged where the call information is analyzed, and a score is calculated. The score is an indication if the call is likely or unlikely to be a fraud call based upon whether or not the calling number has a poor reputation, is invalid, unallocated, or on a Do Not Originate list.

The score is evaluated, based on default defined rules, to determine the appropriate call validation treatment. The two choices for call validation treatment are to block the call or allow it to proceed normally. Call validation treatment is enforced by our Ribbon session border controllers based on information received from Ribbon's Reputation Scoring service.

Additionally, NCTC/NCC has deployed the Ribbon Analytics Fraud Application to provide robocall analytics of inbound traffic from our customers or traffic that we might transit between carriers. The Ribbon Analytics Fraud Application identifies patterns of suspected illegal robocalls based on the aggregate of their individual behaviors which indicates suspicious, abnormal call volume or activity. These behaviors are incorporated into the calculation of the overall fraud score by Ribbon's Reputation Scoring Service.

Know Your Customer

NCTC/NCC has set a call path level based on its average customer size. The level – referred to as "large volume calling capability" – is subject to change.

NCTC/NCC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID, a street address, a business license, legal organizational documents if applicable and verification as to the nature of the business
- An NCTC/NCC representative will visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

- We specifically address with large volume customers that our Terms of Service and/or Acceptable Use Policy include Robocalling language that allows NCTC/NCC to investigate / suspend / or terminate service to customers engaged in robocalling and to share calling information about the customer should we receive a complaint of robocalling.

NCTC/NCC provides a subscription-based, non-commercial legal robocalling product and has directly contacted those subscribers (which include churches, school systems) to educate them about legal versus illegal robocalling activities to insure they continue to remain compliant in their use of the product. NCTC/NCC will continue to monitor these legal robocalling activities to insure they remain compliant with the law.

General Prohibition Against Illegal Robocalling

NCTC/NCC end user services are subject to restrictions contained in its Acceptable Use Policy (“AUP”) found on the website of NCTC/NCC. The AUP specifically prohibits customers/subscribers from engaging in illegal robocalls. End users who purchase telephone services are required to sign an application that includes a contractual obligation requiring compliance with the AUP, including any revisions that may be implemented upon notice. Failure to comply with the AUP allows the telephone services of the end user to be terminated.

Its end users are notified that NCTC/NCC may take action up to suspension or termination of service for violation of the AUP.

III. Traceback and Enforcement Cooperation

NCTC/NCC will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). NCTC/NCC commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither NCTC/NCC nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

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