

Robocall Mitigation Program Description – Interbel Telephone Cooperative

Program Overview:

Interbel Telephone is committed to providing a secure and reliable communication experience for our customers. Our Robocall Mitigation Program is designed to identify, block, and prevent unwanted robocalls, ensuring the integrity of our telecommunication services. This program is in line with industry standards and regulatory requirements to safeguard our customers from fraudulent and malicious activities.

Key Components:

1. **Call Authentication Protocols:** Implementing industry-standard protocols, such as STIR/SHAKEN using TOLY DIGITAL STIR/SHAKEN SERVICES, to verify the authenticity of incoming calls and reduce the incidence of caller ID spoofing.
2. **Real-Time Monitoring:** Utilizing clearip/TranNexus advanced analytics and machine learning algorithms to monitor incoming calls in real-time, identifying patterns associated with robocalls and taking prompt action to mitigate risks.
3. **Blocking and Filtering:** Utilizing clearip/TranNexus blocking and filtering mechanisms to prevent identified robocalls from reaching our customers. This includes leveraging third-party databases and blacklists for enhanced protection.
4. **Educational Outreach:** Conducting awareness campaigns to educate customers about robocall threats, common scam tactics, and ways to recognize and avoid potential risks.
5. **Regular System Updates:** Ensuring our robocall mitigation system is regularly updated to adapt to evolving threats, incorporate new technologies, and maintain the highest level of effectiveness.

Customer Communication:

Transparently communicating with customers about our robocall mitigation efforts, including providing updates on program enhancements, educational resources, and actions taken to address emerging threats.

Compliance with Regulations:

Adhering to all applicable regulations and industry standards governing robocall mitigation, and actively participating in industry collaborations to stay informed and compliant with evolving standards. TOLY Digital is responsible for the origination of the call and affirms that it has an authenticated relationship with Interbel. Interbel is eligible for traffic associated with TOLY SIP Trunks and certifies that it will identify its customers and has a verified association with the telephone number used for the call. TOLY will apply customers own token/certificate to the call for Interbel. Interbel also certifies that it will participate in traceback efforts, including those initiated by the industry Traceback group.

Ongoing Improvement:

Regularly evaluating the effectiveness of our Robocall Mitigation Program through continuous monitoring, analysis of customer feedback, and making necessary adjustments to enhance the program's efficiency. We use software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Contact Information:

For any inquiries related to our Robocall Mitigation Program, please contact:

- Jared Sherwood
- Network Operations Manager
- 406-889-3311
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Interbel Telephone Robocall Mitigation Principals:

1. Caller ID verification:

Work with 3rd party vendor ClearIP for STIR/SHAKEN to authenticate the caller ID and flag potentially spoofed numbers.

2. Traffic analysis:

Monitoring call patterns via MetaSwitch SAS, Peremita and ClearIP user databases for anomalies like unusually high call volumes from a single number or suspicious calling times.

3. Blacklisting:

Maintaining a database using call Logs on MetaSwitch SAS, MetaSwitch user forums and ClearIP of known robocall numbers and automatically blocking calls originating from them.

4. Traceback procedures:

Actively responding to traceback requests from authorities to identify the source of illegal robocalls.

5. Rate limiting:

Setting limits on the number of calls a customer can make within a specific timeframe to prevent excessive robocalling. As well as auto-generated alarms via ClearIP when a unnormal number of calls are transmitted

6. Enforcement actions:

Taking appropriate actions against customers who violate robocall mitigation policies, including suspension or termination of service.

Interbel Telephone Robocall Mitigation Affiliates:

None

Interbel Telephone Robocall Mitigation Subsidiaries:

None

Interbel Telephone Robocall Mitigation Parent Companies:

None

Avoid Originating:

1. Implementing industry-standard protocols, such as STIR/SHAKEN using TOLY DIGITAL STIR/SHAKEN SERVICES, to verify the authenticity of outgoing calls and reduce the incidence of caller ID spoofing.
2. Implement industry standards suggested by MetaSwitch to lock down our soft switch to require 12-digit registration PINS for devices registering to our switch

Carrying, or processing illegal robocall traffic:

1. Implementing industry-standard protocols, such as STIR/SHAKEN using TOLY DIGITAL STIR/SHAKEN SERVICES, to verify the authenticity of outgoing calls and reduce the incidence of caller ID spoofing.
2. Implement industry standards suggested by MetaSwitch to lock down our soft switch to require 12-digit registration PINS for devices registering to our switch
3. Daily monitoring of ClearIP database to show spi9kes or rogue traffic within our calling network
4. Auto-generated emails when thresholds above normal set limits are exceeded

Complies with its obligation to know its customers and/or upstream providers

1. Work directly with Toly Digital and VisionNet to ensure they are meeting the FCC requirements for RoboCalling

Analytics system(s) it uses to identify and block illegal traffic

1. ClearIP
2. MetaSwitch SAS

Third-party analytics vendor(s) and the name(s) of such vendor

1. ClearIP