

SOUTHEASTERN INDIANA RURAL ELECTRIC MEMBER COOP. ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps that Southeastern Indiana Rural Electric Cooperative Inc. (SEIREMC) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Per 47 CFR § 64.6304(B), SEI REMC is not obligated to implement STIR/SHAKEN because SEI REMC is incapable of obtaining an SPC token due to Governance Authority policy which requires an OCN to obtain a SPC Token.

SEIREMC has contracted with SEI Communications under a joint venture arrangement to provide numbering for assignment to all customers. SEI Communications also provides call routing for the assigned numbers. SEIREMC and SEI Communications connect via SIP. SEI Communications has implemented STIR/SHAKEN within its network and signs the originating calls on behalf of SEIREMC customers routing on the SEI Communications IP network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

SEIREMC has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. SEIREMC thoroughly vets new and renewing customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Although SEIREMC’s customers generally do not generate a high volume of calls, were SEIREMC to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services. At a minimum, SEIREMC would collect information such as the customer’s physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

“Know-Your-Upstream Provider” Procedures

The connections that SEIREMC has with upstream providers is through a Joint Venture with SEI Communications and has been in place for many years, and we know this company very well. SEIREMC collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

SEI Communications, a joint venture partner of SEIREMC has contracted with JSI, an engineering firm, for Robocall Origination Detection Service. JSI downloads call detail records on a monthly basis and looks for patterns indicative of originating robocalling. JSI emails SEI Communications a monthly report identifying any detected suspicious call activity. SEI examines the reports and investigates and identifies the source of the calls as unlawful or legitimate. If it is determined that a SEIREMC customer is originating unlawful robocalls on our network, SEIREMC will either warn the customer to stop or terminate their service as allowed per SEI’s policy.

Commitment to Respond to Traceback Requests

SEIREMC commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.