



Robocall Mitigation - STIR/SHAKEN Plan

Perry-Spencer Communications (PSC), Operating Company Number 5584, 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).

PSC provides local service to fewer than 100,000 voice subscriber lines. PSC still has customers served on the non-IP portions of its network which relies on technology that cannot initiate, maintain, carry, process, and terminate calls.

Know Your Customer

PSC follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. PSC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. PSC 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), last four digits of their social security number, 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. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup.

STIR/SHAKEN

PSC has contracted with Toly Digital to sign all SIP calls that originate on our network with the exception of non-IP Portions of network. PSRTC has registered with the Policy Administrator and is an authorized service provider in the STIR/SHAKEN ecosystem. Toly Digital uses our token and signs the calls originating on the IP portions of PSC's network. Voice traffic that originates on our network is subject to the robocall mitigation program described below.

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Call Analytics

PSC has contracted with TransNexus / Clear IP to provide robocall analytics and reputation scoring of our network's outbound traffic.

PSC uses 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.

Internal Traffic Monitoring & Analytics

PSC monitors all originating network traffic for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful.

Enforcement

Illegal robocalls and fraudulent spoofing are prohibited on our network. If it is determined a PSC customer is using our network to fraudulently spoof calls or to originate illegal robocalls, PSC will either warn the customer to stop such practices or terminate their service as allowed per PSC policy.

PSC customers receive notice of our company's prohibited use of its network for the initiation of fraudulent spoofing and robocalls. If the customer is found in violating the prohibited use terms, their service may be terminated.

Upstream Provider Knowledge

PSC knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. PSC has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, PSC is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

PSC is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. PSC 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.

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**Traceback**

PSC 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. PSC 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

PSC has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling. PSC has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

PSC 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.

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Management and Ownership

Company Name	Relationship to Filing Entity	Type of Company	% Owned by Filing Entity	Management or Control of the Entity
Perry-Spencer Rural Telephone Cooperative, Inc. d/b/a PSC Fiber (PSRTC)	Parent	ILEC	100%	Daren Brown – President/CEO
Perry-Spencer Communications (PSC)	Subsidiary	CLEC	100%	Daren Brown – President/CEO

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