



Robocall Mitigation - STIR/SHAKEN Plan

Ligonier Telephone and LigTel Communications, LigTel hereafter, is eligible for the continuing extension of the STIR SHAKEN implementation deadline because it has non-IP portions within its network §64.6304(d). LigTel 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. Our connected upstream carriers do not support IP connectivity at this time, so LigTel Communications is unable to convert all of its network to IP.

LigTel provides local service to fewer than 100,000 voice subscriber lines.

LigTel Communications is an active member of the National Telecommunications Cooperative Association (NTCA) which participates in a Working Group on Non-IP Solutions for Call Authentication.

Know Your Customer

LigTel follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. LigTel has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. LigTel thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new services or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), their social security number, date of birth, phone number, email, and establish two security questions, 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

LigTel has partnered with TNS to mitigate Robocalls originating on our network. LigTel is also blocking the origination of all unallocated and unused LigTel telephone numbers. LigTel provides a hosted voice solution using cloud-based VoIP services provided by Toly Digital. Toly Digital is registered with the Policy Administrator and is an authorized provider in the STIR/SHAKEN framework in partnership with TransNexus as the STI-Certificate Authority (STI-CA). Toly Digital uses LigTel Communications' Certificate, from the STI-PA, to sign all LigTel Communications calls originating on the IP portions of the LigTel network.

Call Analytics

LigTel uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. 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

LigTel 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 LigTel customer is using our network to fraudulently spoof calls or to originate illegal robocalls, LigTel will either warn the customer to stop such practices or terminate their service as allowed per LigTel policy. LigTel 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

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

Role In the Call Chain

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

LigTel commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo callers that we learn are using our service to originate calls. LigTel 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

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

Customer Education

LigTel 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.

Point of Contact

Josh Wentworth, Chief Technology Officer, is LigTel's single point of contact for robocall mitigation efforts.

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Office: (260) 894-7161 Cell: (260) 894-5275

414 South Cavin Street ♦ Ligonier, Indiana 46767
Phone: (260) 894-7161 ♦ Toll Free: (800) 714-6353
www.ligtel.com