

Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan

Delta County Tele-Comm, Inc.

Executive Summary

The purpose of this Partial STIR/SHAKEN Implementation and Robocall Mitigation Plan (RMP) is to implement best practices, procedures and policies to mitigate or reduce originating illegal traffic (aka robocalls).

Delta County Tele-Comm, Inc. will:

1. Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - a. <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
2. Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
3. Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
 - a. Investigate suspected illegal traffic
 - b. Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - i. Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
4. Prevent any calls being blocked to or from emergency services
5. Implement the following best practices, policies and procedures as part of Delta County Tele-Comm, Inc.'s RMP

Point of contact for this RMP:

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Regulatory Background

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on SIP/IP traffic on their networks as well as to implement an RMP on non-SIP/IP traffic (aka TDM traffic) on their network.

The FCC granted a continuing extension for voice service providers with non-IP networks (aka TDM) from implementing STIR/SHAKEN authentication. Below are the rule sections that apply to Delta County Tele-Comm, Inc.:

Basis for Exemption

Delta County Tele-Comm, Inc. is a “small voice service provider” that has approximately 1,500 voice service subscriber lines. Delta County Tele-Comm, Inc.’s voice network is currently partial IP and partial non-IP for outgoing traffic to the tandem. For the non-IP portion of its network and it is required to comply with the requirements of §64.6303 (a). This non-IP tandem connection carries some of their traffic to the outside world and relies on a technology that cannot originate, carry, process, or terminate SIP calls. Alianza provides STIR/SHAKEN services on behalf of Delta County Tele-Comm, Inc. consistent with 47 CFR § 64.6301(a).

Meeting §64.6303(a)(2) Obligations

Delta County Tele-Comm, Inc. is a member of National Exchange Carrier Association (NECA) which acts as its third party representative to develop a non-internet Protocol caller identification authentication solution. NECA is a member of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Roll in the Call Chain

Delta County Tele-Comm, Inc. is a voice service provider providing voice service and broadband services to end user customers inside its serving area. Delta County Tele-Comm, Inc. has a partial STIR/SHAKEN obligation at this time due to having both IP network and non-IP network (see above).

Operating Company Number (OCN)

Delta County Tele-Comm, Inc. Operating Company Number (OCNs) is 2184.

Status of participation in the Robocall Mitigation Database (RMD)

Delta County Tele-Comm, Inc. has not been prohibited from filing in the RMD.

Commission, law enforcement and/or regulatory action or investigation related to spoofing or suspected unlawful robocalls

Delta County Tele-Comm, Inc. has not been involved in any Commission, law enforcement and/or regulatory action related to spoofing or suspected unlawful robocalls. Delta County Tele-Comm, Inc. has not been removed from the RMD and precluded from refiling due to deficiencies needing to be cured. Delta County Tele-Comm, Inc. authorization has not been revoked due to continuing violations of the Commission's robocall mitigation rules.

Prior two years status

In the past two years Delta County Tele-Comm, Inc. has not been the subject of a formal Commission, law enforcement and/or regulatory action or investigation with accompanying findings of actual or suspected wrongdoing due to Delta County Tele-Comm, Inc. transmitting, encouraging, assisting or otherwise facilitating illegal robocalls or spoofing related to spoofing or suspected unlawful robocalls.

Know your upstream provider

Alianza's platform prevents users from "spoofing" CallerID by only allowing accounts to use telephone numbers that they own as CallerID (which is the primary technique used by illegal robocallers). Alianza also monitors Delta County Tele-Comm, Inc.'s outbound voice traffic to alert for spikes in usage to be investigated for bad actors. The alerts identify calling patterns that would indicate robocall activity, such as unusual number of calls from a telephone number and/or an unusual number of short duration or incomplete calls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list in the FCC consumer complaint database or has a poor reputation. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, as then Delta County Tele-Comm, Inc. either warns them to stop or terminates their service, as appropriate pursuant to its Acceptable Use Policy.

Know your Customer

Delta County Tele-Comm, Inc. takes the following steps to prevent new and existing customers from originating robocalls over its network:

- The vast majority of Delta County Tele-Comm, Inc. subscribers are defined as a "direct" retail consumer or commercial end users located inside our serving areas
 - These subscribers are best defined as residential and small business customers and Delta County Tele-Comm, Inc. will:
 - Validates the residential or business customer's identity

- Validates the physical location which will be the fixed location where service is established
- For any commercial VoIP customers, Delta County Tele-Comm, Inc. will gather the following information as reasonably practical to “Know your Customer”:
 - Physical business location
 - Contact person’s information
 - State or country of incorporation
 - Federal tax ID number
 - Nature of the customer’s business
- Delta County Tele-Comm, Inc. does not offer service currently to wholesale subscribers

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Long Distance Traffic

Delta County Tele-Comm, Inc. uses a third party administrator, Alianza, for STIR/SHAKEN consistent with 47 CFR § 64.6301(a). Alianza delivers a full stack, cloud-native communications network services with carrier grade infrastructure and support to advance network modernization for service providers.

Additionally, Delta County Tele-Comm, Inc. has implemented the following best practices, policies and procedures to mitigate unlawful illegal traffic (robocalls):

- Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
- Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
- Investigate suspected illegal traffic
 - Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
- Prevent any calls being blocked to or from emergency services

Robocall Mitigation Plan (RMP)

Robocall Mitigation Efforts: Local and/or EAS Traffic

Delta County Tele-Comm, Inc. **has implemented the following best practices, policies and procedures to mitigate unlawful illegal traffic (robocalls):**

- Know its customer and will follow the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as listed below:
 - <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>
- Cooperate with traceback requests received from carriers, the registered traceback consortium and law enforcement within 24 hours of receipt of such request
- Take steps when notified by the Commission's Enforcement Bureau to mitigate any suspected illegal traffic
- Investigate suspected illegal traffic
 - Report back to the Enforcement Bureau the results of said investigation and any mitigation steps taken
 - Including whether any of the calls came from another voice service provider with direct access to the U.S. public switched telephone network (PSTN)
- Prevent any calls being blocked to or from emergency services
- All residential and business lines can place only one call at a time
- All residential and small retail business lines are only able to place calls originating from their own phone number
- Businesses with Trunk Hunting or hosted VoIP are allowed to send spoofed numbers for legitimate business needs. This includes a main line number, DODs, toll free number, etc.
 - Caller ID and Setup are reviewed when the service is installed to verify legitimate caller ID information
- Only numbers residing in our switch are assigned to residential and business lines
- Investigate any complaints about legitimate calls being blocked
- Call history records are created for all long distance and EAS calls and are searchable, for as long as the records are retained

Appendix A Third Party Service Agreements

None