

CONSOLIDATED TELCOM ROBOCALL MITIGATION PLAN

Consolidated Telcom, referred to as Consolidated hereafter, Operating Company Number (1607), 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).

Consolidated provides local service to fewer than 100,000 voice subscriber lines. A majority of the customers are served on the non-IP portions of Consolidated's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Consolidated is a member of NTCA which participates on the ATIS Non-IP taskforce working group that developed the (ATIS Solutions) non-IP call authentication solutions. NTCA serves as Consolidated's third party representative on the ATIS Non-IP taskforce working group.

Consolidated also originates calls via SIP connections within its network. Consolidated has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Consolidated has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Consolidated's network.

Robocall Mitigation Plan

All voice traffic that originates on Consolidated's network is subject to the following Robocall Mitigation Plan.

Customer Interaction

Consolidated takes the following steps with respect to its customers to prevent originating robocalls. Consolidated verifies new residential customers are legitimate by using Social Security Number and a soft credit check or by requiring a Letter of Reference from another utility company. Consolidated verifies new business customers are legitimate by using Tax Identification Number and a soft credit check. Consolidated has adopted a Voice Services Acceptable Use Policy (VSAUP) that describes action taken for illegal robocalls. This VSAUP is available on Consolidated's website at Voice Services Acceptable Use Policy.pdf (ctctel.com).

Originating Traffic Monitoring

Consolidated is using the Metaswitch/TNS Call Guardian Authentication Hub analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. This is a fully managed service to provide real-time reputation scoring and analytics to fight both originating and terminating robocalls. Consolidated reviews the Call Guardian analytics daily reports and takes appropriate action based on the reputation scoring and analytics, and in accordance with its Voice Services Acceptable Use Policy. Consolidated is also blocking calls originating from invalid numbers per the FCC's 2017 Call Blocking Order.

Robocall Mitigation Enforcement

Consolidated will block originating traffic identified as illegal robocalls and may terminate service entirely, in accordance with its Voice Services Acceptable Use Policy which prohibits the use of telephone numbers for illegal robocalls and fraudulent purposes. Telephone numbers flagged as being used for illegal robocalls will be reported to the FCC and FTC.

Upstream Provider Knowledge

Consolidated knows all the carriers from which it receives traffic. Consolidated has confirmed that all its connected carriers are listed in the Robocall Mitigation Database and Consolidated has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Consolidated is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

Consolidated is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. Consolidated is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of Consolidated's network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Consolidated 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. Consolidated 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

Consolidated has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Consolidated has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Consolidated provides robocall mitigation education to its customer base. The robocall customer education information and the Consolidated Robocall Mitigation Plan are posted on Consolidated's website at Robocall Information - ctctel.com. Consolidated encourages its customers to enroll in the Do Not Call Registry when they sign up for service, by information in bill stuffers and on its website at Do Not Call Registry Info on ctctel.com.