

## **Dunkerton Telephone Cooperative d/b/a Dunkerton Communications**

### **Acceptable Use Policy for Voice Robocall Mitigation**

**Abbi Kienast General Manager, 319-822-4512**

#### **Traceback Cooperation**

- Dunkerton Telephone Cooperative d/b/a Dunkerton Communications (Dunkerton Communications) will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, Dunkerton Communications will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. Dunkerton Communications has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible or in 24 hours not to include weekends or holidays.
- Dunkerton Communications will request traceback cooperation. For all new and renegotiated service applications the transport of voice calls, our web policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

#### **Subscriber Vetting Practices**

- Residential and small business practices
  - Dunkerton Communications will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
  - Dunkerton Communications will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
  - Dunkerton Communications has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Dunkerton Communications will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Dunkerton Communications will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.

#### **Telephone Number Validation Practices**

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to the VSP. Dunkerton Communications will validate as necessary and appropriate.

### **Ongoing Mitigation Practice**

- Dunkerton Communications will investigate suspicious calls and calling patterns. If Dunkerton Communications detects a pattern consistent with illegal robocalls, or if Dunkerton Communications otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, Dunkerton Communications will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying law enforcement authorities.
- Dunkerton Communications has contracted with third-party, Aureon, for near-real time and ongoing robocall mitigation data analytics.

Contact information for Dunkerton Telephone Cooperative d/b/a Dunkerton Communications

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