



Robocall Mitigation Plan Description for Silver Star Communications (all affiliated companies*)

Pursuant to 47 CFR 64.6305, Silver Star Telephone Company, Inc. dba Silver Star Communications (“Silver Star”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

1. Silver Star is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR/SHAKEN Implementation under 47 CFR 64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

(a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.

(2) For purposes of this paragraph (a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).

2. Silver Star commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. Silver Star has taken the following specific steps to detect originating robocall traffic:
While Silver Star’s policies for detecting originating robocall traffic are still under development as far as software and traffic analyzers are concerned, and absent placing a call trace on random customers lines, Silver Star’s options are limited at this time. Steps Silver Star is currently taking include:
 - a. Manual and random analysis of call detail records for high-volume network traffic;
 - b. Identification and monitoring of patterns consistent with robocall campaigns (i.e., short duration calls with low completion rates)
4. Silver Star has taken the following steps to prevent illegal originating robocalling traffic:
 - a. Silver Star has policies in place to confirm the identity of new commercial customers (i.e., collecting physical business location information, direct contact information for customer personnel, including email addresses and phone numbers, the general nature of the customer’s business, state of incorporation and its federal tax id.)
 - b. Silver Star provides its customers with access to call blocking mechanisms and regularly communicates the availability of caller id and call blocking features.
 - c. Silver Star’s robocall mitigation policies are publicly available on its website within its terms of service.
5. Silver Star has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
 - a. Customers will be notified upon detection of suspected illegal activity and multiple violations may result in service termination (as stated in its terms of service).
 - b. Silver Star regularly communicates with its customers its robocall mitigation policies and penalties for confirmed violations.

This Robocall Mitigation Plan describes the specific measures that Silver Star has implemented to detect and prevent illegal robocalls on its network as of June 30, 2021. Silver Star will periodically evaluate the risks it faces, the effectiveness of its policies and procedures and its capabilities to support the measures described. Should Silver Star determine that changes are appropriate, its practices may differ from those described above.

* **Columbine Telephone Company, Inc. Gold Star Communications, LLC Millennium Networks, LLC Silver Star Telephone Company, Inc.**