Manning Municipal Utilities, Manning Iowa and formerly known as

Manning Municipal Cable Television System Utility

Robocall Mitigation Plan

Traceback Cooperation

Manning Municipal Utilities (MMU) will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, MMU will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. MMU 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 of notification.

- MMU will require traceback cooperation. For all new and renegotiated contracts governing the transport of voice calls, our 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
  - MMU will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
  - MMU 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.
  - MMU has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. MMU will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. MMU 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. MMU will validate as necessary and appropriate.

International Practices

- MMU will continue to monitor best practices and implement as needed.

Ongoing Mitigation Practices

- MMU will investigate suspicious calls and calling patterns. If MMU detects a pattern consistent with illegal robocalls, or if MMU otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, MMU 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.

- MMU monitors the following as part of its robocall mitigation techniques:

  Monitor high volume subscriber traffic

  Large bursts of traffic in small timeframes

  Inconsistent volumes of traffic (spikes)

  Low call duration and low completion percentages

  High volume of calls from invalid numbers

  Sequential dialing patterns

  Monitor suspicious calls and calling patterns

  High call volumes to do-not-call registry or invalid numbers

  As of May 2021, MMU has contracted with Inteliquent/Voyant services for hosted switching services and is migrating business customers to their platform and network. Inteliquent is Stir Shaken compliant.   MMU will work closely with Inteliquent to be Stir Shaken compliant before 2023.

  Contact information for Manning Municipal Utilities

  Jason Ehlers at 712 655-3214 and email jason@manningia.com

  Jeremy Carroll at 515-231-1793 and email jeremy@manningia.com