

109 N. Ave D
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Use of Call Analytics Systems

We use software provided by TransNexus to monitor our inbound and outbound voice traffic in real time to prevent origination of robocalls. The software provided detailed reporting that we use to identify suspected illegal robocalls and will proactively alert us to any incoming or outgoing suspicious activity. We immediately investigate to determine if the calls are illegal and will either warn, suspend, or terminate service completely if we find that calls are unlawful.

STIR/SHAKEN Extension

Brazos Communications is eligible for and using the extension received under 47 CFR 64.6304 because we have fewer than 100,000 voice subscribers. Brazos Communications still has portions of its network that are TDM and cannot support STIR/SHAKEN. We are also making steps to become compliant in the near future. We utilize our upstream provider (USAD) for authenticating with traffic flowing to and from our network.

Traceback

Brazos Communications responds to all traceback requests from the FCC, law enforcement, and the registered traceback consortium and will cooperate with such entities in investigating and stopping illegal robocalls that use our service to originate calls.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

Brazos Communications follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls. We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer. While requests for high-volume origination services are rare, Brazos Communications exercises caution and extensively investigates new customers seeking access to such services.

“Know-Your-Upstream Provider” Procedures

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Brazos Communications exercises due diligence before accepting traffic from an upstream provider in order to ensure that the provider is not using our network to carry or process a high volume of illegal traffic.

It is Brazos Communications policy to collect certain information from upstream providers, such as their physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the provider's business.