



Moapa Valley Telephone Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Moapa Valley Telephone (MVT) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

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

MVT has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. MVT serves fewer than 5,000 lines which are mostly residential. MVT’s business customers are mostly small businesses that are physically located in our service territory. Prior to a new business customer ever making a call, we personally know, or get to know the business owners and/or management. This personal touch gives MVT a clear view of whether the business is a risk for originating illegal robocalls.

MVT vets the identity of retail and wholesale business customers in conjunction with: (1) approving applications for service, (2) provisioning network connectivity, (3) entering into any contract agreements, and (4) granting the right to use telephone number resources. As part of the vetting process, MVT collects information such as the customer’s physical business location, contact person(s), federal tax ID, and the general nature of their business. MVT has never received a request for high-volume origination services. However, were MVT to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to granting access to the service.

With limited exceptions, MVT’s customers are only able to originate calls from the number that has been assigned to them. This prevents customers from originating calls from a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on MVT’s network.

MVT's Acceptable Use Policies, posted on the company’s website, states that subscribers must agree to use their service only for authorized, lawful purposes and that a violation may result in the immediate inactivation or termination of service. MVT would not hesitate to enforce this policy if a customer was found to be using their voice service to make illegal robocalls.





“Know-Your-Upstream Provider” Procedures

Currently, the only upstream providers from which MVT receives traffic are Lumen and AT&T. MVT’s connections with these companies have been in place for many years, and we know these companies very well. Before accepting traffic from any new upstream provider, MVT would exercise due diligence and seek to ensure that the provider is not using MVT to carry or process a high volume of illegal traffic. Specifically, MVT would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

MVT uses software provided by TransNexus to monitor our outbound TDM and IP voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. MVT immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

In addition, MVT uses TransNexus’s robocall blocking service to screen all inbound calls against their database of robocall caller IDs, and high-risk and invalid numbers.

Commitment to Respond to Traceback Requests

MVT commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.

Enhanced Know-Your-Customer Procedures

In addition to the customer vetting procedures described above, MVT will exercise enhanced due diligence when evaluating any applicant seeking high-volume call origination services or other services that may present an elevated risk of illegal robocall activity. Such due diligence may include verification of business registration records, confirmation of physical business locations, review of publicly available information regarding the business, validation of the customer's authority to use requested telephone numbers, and any other reasonable measures necessary to assess the risk that the applicant may originate illegal robocalls.





MVT will monitor customer calling activity through its call analytics systems and investigate unusual traffic patterns, suspicious increases in call volume, invalid caller identification information, traceback requests, or other indicators of potentially unlawful robocall activity. MVT reserves the right to suspend or terminate service when it determines that a customer is originating illegal robocalls or otherwise violating applicable laws, regulations, or company policies.

Robocall Mitigation Database Updates

MVT will maintain accurate and current information in the FCC Robocall Mitigation Database. In the event of any material change to the information contained in its certification, mitigation plan, contact information, or mitigation practices, MVT will update its filing within ten (10) business days or within any other timeframe required by applicable FCC rules.

Annual Review and Certification

MVT will review this Robocall Mitigation Program and its FCC Robocall Mitigation Database filing on at least an annual basis to ensure continued compliance with FCC requirements and to reflect any operational, regulatory, or technological changes affecting its robocall mitigation practices.

