

Barry County Telephone Company

Robocall Mitigation Plan

Introduction

- Pursuant to the applicable orders and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following is the Robocall Mitigation Plan (“RMP”) that details the procedures of Barry County Telephone Company (“Company” or “BCTC”) to prevent unlawful robocalls from originating, terminating, or being carried or processed on Company’s voice network where it is operating as a Voice Service Provider. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls
- Company Summary: BCTC is a wholly owned subsidiary of Barry County Services Company (“BCSC”) and is affiliated with MEI Telecom, Inc. (“MEI”). BCTC only serves as a Voice Service Provider. It is not an Intermediate Provider (i.e., it is not a Gateway Provider and is not a Non-Gateway Intermediate Provider).

BCTC’s Operating Company Number (“OCN”) is 0676. Pursuant to 47 C.F.R. § 64.6305(d)(4)(vi), BCTC’s role in the call chain is as a Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users.

Certification

- Company, by submitting this RMP, hereby certifies that (a) all calls originating on its network are subject to this RMP which satisfies the FCC’s requirements, (b) any prior certification of the Company has not been removed by Commission action and (c) BCTC (including any parent and affiliates) has not been prohibited from filing in the Robocall Mitigation Database (“RMD”) by the Commission. Pursuant to 47 C.F.R. § 64.6305(d)(1)(i), Company has also certified that it has fully implemented STIR/SHAKEN across its network and all calls it originates are compliant with Commission rules. BCTC (and any parent, affiliate or any entity that shares common ownership, management, directors, or control) has not been the subject of any formal Commission law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or RMP description.

Only Accepting Traffic from Providers that Have Affirmatively Filed in the RMD

In accordance with FCC rules referenced below, BCTC only accepts traffic from providers that at a minimum satisfy the following requirements:

- Accepting traffic from domestic Voice Service Providers. In accordance with 47 C.F.R § 64.6305(g)(1), BCTC accepts calls directly from a domestic Voice Service Provider only if that Voice Service Provider's filing appears in the RMD and that filing has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Foreign Voice Service Providers or Foreign Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(2), BCTC accepts calls from Foreign Voice Service Providers or Foreign Intermediate Providers that use NANP resources that pertain to the U.S. in the caller ID field to send voice traffic to residential or business subscribers in the U.S., only if that foreign provider's filing appears in the RMD in accordance with paragraph and that filing has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Gateway Providers. In accordance with 47 C.F.R § 64.6305(g)(3), BCTC accepts calls directly from a Gateway Provider only if that Gateway Provider's filing (a) appears in the RMD, (b) shows that the Gateway Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Non-Gateway Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(4), BCTC accepts calls directly from a Non-Gateway Intermediate Provider only if that Non-Gateway Intermediate Provider's filing (a) appears in the RMD, (b) shows that the Non-Gateway Intermediate Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.

BCTC's Know Your Upstream Provider procedure involves checking the RMD to see if the Provider's filing (a) appropriately appears in the RMD, (b) shows that the provider has submitted the applicable filing, and (c) has not been de-listed pursuant to an enforcement action. Sinch (formerly Inteliquent), thinQ Technologies, Inc. d/b/a Commio and AT&T Tandem are BCTC's Intermediate Provider, which are currently and appropriately listed in the RMD.

STIR/SHAKEN Compliance

BCTC subscribes to Ribbon Communications' STIR/SHAKEN as a Service which provides us access to a complete STIR/SHAKEN solution. We use Ribbon's service for the Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functions. We have our own STIR/SHAKEN certificate which is issued by Ribbon.

Traceback Cooperation

- Barry County Telephone Company will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, Barry County Telephone Company will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's

Industry Traceback Group. Barry County Telephone Company 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 within 24 hours.

- Barry County Telephone Company will require traceback cooperation. For all new and renegotiated service applications 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
 - BCTC will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
 - BCTC 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.
 - BCTC has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. BCTC will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. BCTC will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.

Telephone Number Validation Practices and Authenticating Voice Traffic

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to the VSP. BCTC will validate as necessary and appropriate. When operating as a Voice Service Provider, BCTC does the following (1) authenticates and verifies caller identification information for all SIP calls that exclusively transit its own network; (2) Authenticates caller identification information for all SIP calls it originates and that it will exchange with another Voice Service Provider or Intermediate Provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next Voice Service Provider or Intermediate Provider in the call path; and (3) verifies caller identification information for all SIP calls it receives which it will terminate and for which the caller identification information has been authenticated.

International Practices

BCTC will continue to monitor best practices and implement as needed.

Ongoing Mitigation Practices

- BCTC will investigate suspicious calls and calling patterns. If BCTC detects a pattern consistent with illegal robocalls, or if BCTC otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, BCTC 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. BCTC has deployed Ribbon Communications Call Trust Originating Robocall Mitigation Solution to monitor against suspicious calling activities including high call volumes and illegal robocalls. Ribbon Identity Hub Reputation Scoring can detect and mitigate illegal Robocalls in real time by detecting calls from callers matching Do not originate lists, unassigned or unallocated numbers, databases containing known robocall numbers.
- BCTC monitors the following as part of its robocall mitigation techniques thru their billing software (CDG):
 - Checks originating calls to verify the phone number is a current Barry County Telephone subscriber.
 - Checks for over 100 originating calls per previous day per directory number.

If either of these rules are violated the system sends out a notification listing the calls in violation.

- BCTC also offers, for a charge, their subscribers The Terminating Call Management (TCM) service which allows their subscribers the ability to screen calls prior to terminating the call at the subscriber's line. The TCM service gives the subscriber control over who may call their account and when calls get delivered to their phone.
- BCTC also has calls originating on SIP trunks thru a provider that are STIR/SHAKEN compliant.

Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

- To further ensure BCTC's network is not utilized for the origination, termination, or carrying or processing of unwanted and illegal robocalls, BCTC provides the following name, title, department, business address, telephone number, and email address of the individual within BCTC that leads BCTC's team that handles robocall mitigation-related issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Contact Name:	David Stoll
Contact Title:	CEO
Contact Department:	Main Office

Contact Street Address:	123 W. Orchard
Contact City:	Delton
Contact State and Zip Code:	Michigan 49046
Contact Telephone Number:	(269) 623-2311
Contact Email:	regreports@mei.net

Updates to BCTC's RMD Submission and RMP

- The Company agrees to update its submission in the RMD within ten (10) business days of any change to the applicable information it must provide and update in the RMD.