

**Board of Water, Light & Sinking Fund Commissioners of the City of
Dalton, Georgia
d/b/a Dalton Utilities
1200 VD Parrott Jr Dr
Dalton, GA 30720**

Dalton Utilities is a local service provider that provides services to end user residential, small and medium size business customers in Whitfield and Murray Counties, GA. Dalton Utilities has approximately 9,400 voice subscriber lines.

Dalton Utilities has a multi-step approach to prevent origination of unlawful robocalls from our network.

Network Design

- Dalton Utilities core telephone switch does not permit routing calls for telephone numbers it does not have in its database. Any call that originates on our network has to be by a telephone number that is owned by Dalton Utilities.
- The majority of Dalton Utilities subscriber lines are analog, hosted SIP phones, and legacy PRIs. These services do not have the ability to spoof their Calling Number.

Know Your Customer

- Dalton Utilities takes numerous steps to verify the identity of our customers.
- Dalton Utilities is a facility based local service provider. Dalton Utilities provides local phone service to end users via its fiber optic network, so every customer has a known physical location.

STIR/SHAKEN Implementation

- Dalton Utilities has a mixture of both legacy TDM and IP based trunks to ILEC and LD partners.
- Dalton Utilities is currently signing calls leaving our network on IP-Based facilities with our STIR/SHAKEN certificate.
- Dalton Utilities is in the planning stage of converting legacy TDM trunks to IP based SIP trunks. Any new SIP trunks will be included in our STIR/SHAKEN implementation.

Robocall Mitigation Software and Network Monitoring

- Dalton Utilities has deployed software from TransNexus Networks to monitor outbound traffic in real time to prevent illegal robocalls. This software can identify if a calling party number has been spoofed, or is a number that does not belong to Dalton Utilities, and block that call in real time.
- Dalton Utilities Long Distance provider partner also monitors all toll traffic in real time for any patterns that appear to be fraudulent, and takes immediate action to block any suspicious call activity and alert all affected parties.

Traceback

- Dalton Utilities stands ready to respond to traceback requests from the Commission, law enforcement, and the registered traceback consortium. Dalton Utilities will cooperate with such entities in investigating and stopping any illegal robo-callers.