

Smart City Telecommunications LLC

Robocall Mitigation Program

Smart City Telecommunications LLC (Smart City Telecom) is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d). Smart City Telecom is 100% non IP.

Smart City Telecom provides local service to fewer than 100,000 voice subscriber lines. Some of the customers are served on the non-IP portions of the network which relies on technology that cannot initiate, maintain, carry, process, and terminate calls. Smart City are also members of the USTelecom and are on Robocall working group to discuss robocall, caller ID, Stir Shaken and other subjects.

All voice traffic that originates on Smart City Telecom's network is subject to the following Robocall Mitigation Program

Call Analytics

Smart City Telecom has deployed the TransNexus ClearIP robocall mitigation service within its network. The Clear IP solution meets the robocall mitigation program specifications to significantly reduce the origination of illegal robocalls on Smart City Telecom's network.

Smart City directs all outbound calls to perform a dip into the ClearIP database for calling number validation. ClearIP dips calling numbers originating from Smart City to a third party robocall reputation service provider and identifies calling numbers with a bad robocall reputation score.

ClearIP offers other feature functionality which is set by Smart City including manual blacklisting and blocking calling numbers from originating on Smart City Telecom's network; calls from improperly formatted or unallocated numbers are not allowed to originate; calling numbers are reported to the FCC as a consumer complaint for being a robocaller, or a number in the "do not originate" list is prevented from originating on Smart City's network. Smart City uses the extensive suite of call management reports available through the ClearIP service.

If ClearIP identifies the calling number as a potential robocall, it will send back a certain message code to Smart City's indicating that the call should be blocked. Smart City will verify and confirm the call treatment by ClearIP and if in agreement, Smart City will not allow the call to complete on the network. If ClearIP does not identify the calling number as a potential robocall, it will send back a different message code to Smart City and Smart City will allow the call to complete and send the call to the far end.

Know your Customer

Smart City Telecom has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Smart City Telecom thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Upstream Provider Knowledge

Smart City Telecom knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. Smart City Telecom monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic identified and notified, that if the traffic does not cease, the calls may be blocked from entering Smart City Telecom's network. No provider is using Smart City Telecom's network to carry or process a high volume of illegal traffic. In addition, Smart City Telecom is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Smart City Telecom commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Smart City Telecom commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.