

Smart City Solutions II LLC
Robocall Mitigation Program

Smart City Solutions II LLC (Smart City Solutions) 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 Solutions 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 SIP 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 (IP and TDM) that originates on Smart City Solution's network is subject to the following Robocall Mitigation Program.

Smart City Solutions has registered with the STIR/SHAKEN Policy Administrator, obtained its own SPC token from the Policy Administrator, uses that token to generate a certificate with their Certificate Authority, and authenticates all its calls with that certificate.

Call Analytics

Smart City Solutions 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 Solution's network. Interstate and Intrastate calls are a mixture of SIP and TDM but Smart City has a Session Board Controller (SBC) which has a SIP connection to TransNexus.

The SBC 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 Solution'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 SBC 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's SBC and Smart City will allow the call to complete and send the call to the far end.

Know your Customer

Smart City Solutions has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Smart City Solutions 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 Solutions 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 Solutions 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 Solution's network. No provider is using Smart City Solution's network to carry or process a high volume of illegal traffic. In addition, Smart City Solution is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Smart City Solutions 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 Solutions commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.