



Big Bend Telephone Company, Inc. - Robocall Mitigation Program

Big Bend Telephone Company, Inc. (BBT) Operating Company Number 2039, is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2)) that has non-IP portions within its network §64.6304(d).

BBT provides local service to fewer than 100,000 voice subscriber lines. Most customers are served on the IP portions of BBT's network.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), BBT is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as BBT's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Company Information

BBT's network also has IP-portions which originates calls via SIP connections to other carriers. BBT is registered with the STIR SHAKEN Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Ribbon Communications is Big Bend Telecom LTD's STI-Certificate Authority (STI-CA). BBT has implemented STIR|SHAKEN within the IP portions of its network and authenticates the calls originating on the IP portions of its network with BBT's certificate. BBT utilizes the Ribbon C15 to provide voice services in our coverage area. All calls originating in the BBT network are subject to the robocall mitigation program. STIR/SHAKEN has been employed to authenticate and verify inbound and outbound voice traffic on IP segments of our network. Additional measures will be implemented for non-ip segments of the network once the technology is finalized by industry standards and any supporting equipment or software is readily available.

Robocall Mitigation Plan

Call Analytics

BBT subscribes to Ribbon's Call Trust Reputation Scoring service which provides per-call analytics to assess the likelihood that a call is being made with malicious intent. For each originating call attempt, Ribbon's Reputation Scoring service is engaged where the call information is analyzed, and a score is calculated. The score is an indication if the call is likely or unlikely to be a fraud call based upon whether or not the calling number has a poor reputation, is invalid, unallocated, or on a Do Not Originate list. The score is evaluated, based on default defined rules, to determine the appropriate call validation treatment. The two choices for call validation treatment are to block the call or allow it to proceed normally. Call validation treatment is enforced on our Ribbon session border controller based on information received from Ribbon's Reputation Scoring service.

We provide STIR/SHAKEN using Ribbon's Secure Telephone Identity solution which gives us access to a complete STIR/SHAKEN solution for calls originating on ip portions of BBTs network. We use



Ribbon for both the STI Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functionality. We have our own STIR/SHAKEN certificate which is issued by Ribbon.

At present, BBT also utilizes TransNexus/ClearIP for Robocall Mitigation pertaining to originating calls which egress on TDM IXC trunks. These trunks rely on technology that cannot initiate, maintain, carry, process, or terminate SIP calls and the trunks can also still originate traffic in TDM. Due to those trunks, the TDM portion of the network is still under the STIR SHAKEN extension of non-IP network (§ 64.6304 (d) unless/until they are migrated to IP.

As an additional measure, BBT is actively using Cordell/Nex-Tech's VQM module which generates daily reports containing information from our Ribbon Call History Server. These are utilized for investigation of suspicious call activity and subsequent contact of customers to remedy potential robocall or fraudulent origination. If it is determined that the caller was attempting to originate unlawful robocalls, BBT will warn them to stop and subsequently suspend or terminate their service should the issue continue.

Know Your Customer

BBT's Know Your Customer procedures incorporate the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

BBT practices include:

BBT has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. BBT 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.

Residential Voice customers are asked to provide their full name, address (physical and mailing, if different), date of birth, phone number, email, and establish a security PIN. To initiate an account change, a customer must be an authorized agent on the account and provide the account pin or answer a security question prior to initiating a change

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must be an authorized agent on the account and provide the account pin or answer the security question prior to initiating a change. If the customer is unable to provide that information, the customer service representative will call an authorized agent to confirm the requested change and to update the authorized agents on the account.

**Upstream Provider Knowledge**

BBT knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. BBT has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, BBT is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

BBT is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. BBT is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

Big Bend Telephone Company, Inc. will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. BBT commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

RMD Filing/Investigation History

BBT has not been prohibited from filing in the Robocall Mitigation Database and has not been involved with any recent formal law enforcement or regulatory investigation into suspected unlawful robocalling.