

Robocall Mitigation Plan Description for Blossom Telephone

1. Blossom Telephone Is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

(a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.

(2) For purposes of this paragraph (a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).

2. Blossom Telephone commits to respond within 24 hours to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. Blossom Telephone has taken the following specific steps to detect originating robocall traffic:
 - a. Blossom maintains call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Blossom will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. Blossom will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.
 - b. Blossom will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
 - c. Blossom 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.
 - d. Encourage our customers to use the Do Not Call Registry and to educate them about robocalling and how to avoid scams and fraud.
 - e. Establishing a single Point of Contact (along with backups) for our robocall mitigation program.
4. Blossom Telephone has taken the following steps to prevent illegal originating robocalling traffic:
 - a. Blossom Telephone has less than 3,000 voice subscribers. Its customers do not have the technical capability or access to their telephony service in such a way to allow them to change their caller ID from that which was assigned by the Blossom Telephone provisioning staff.
5. Blossom Telephone has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
 - a. Blossom Telephone processes call detail records and reviews monthly to confirm call volumes are comparable to previous reporting periods and investigates any large spikes in traffic.