

Smith Bagley, Inc.
STIR/SHAKEN IMPLEMENTATION
ROBOCALL MITIGATION CERTIFICATION
ROBOCALL MITIGATION PLAN

Smith Bagley, Inc. (“Company”), FRN 0002154706 submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission’s (FCC’s or Commission’s) rules. The Company does business under the trade name of Cellular One of North East Arizona (“Cellular One”) in the provision of commercial mobile service and under the trade name of Sunstate Technology Group (“Sunstate”) provides interconnected VoIP service.

STIR/SHAKEN Implementation

Company’s role with regards to Cellular One in the call chain is a voice service provider without a STIR/SHAKEN implementation obligation.

Cellular One is exempt from STIR/SHAKEN Implementation requirements as currently all calls rely on non-IP technology. *See* 47 CFR 64.6304(d). The filer certifies that all calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a). Cellular One has implemented a robocall mitigation solution with TransNexus. Cellular One is a member of CCA, which is actively participating in industry efforts to develop a non-IP solution to illegal robocalls.

Company’s role with regards to Sunstate in the call chain is a voice service provider with a STIR/SHAKEN implementation obligation.

Sunstate is a reseller of VoIP and SIP services utilizing Leap Frog Telecom L.L.C. d/b/a Voce Telecom, which has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2).

Cellular One certifies as to the following:

All calls that originate on our network are subject to the attached Robocall Mitigation Plan.

Cellular One will respond fully, within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. Cellular One commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls.

Cellular One and/or any entity for which it shares common ownership, management, directors, or control has never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database

certification or mitigation program. Cellular One has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Sunstate certifies as to the following:

All calls that originate on our network are subject to the attached Robocall Mitigation Plan. Sunstate will respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. Sunstate commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls.

Sunstate and/or any entity for which it shares common ownership, management, directors, or control has never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program. Sunstate has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Identifying and Other Information:

Primary address: 1500 South White Mountain Road, Suite 103, Show Low AZ 85901

Other business names in use: SBi, Cellular One of North East Arizona, a division of Smith Bagley, Inc., Sunstate Technology Group, a division of Smith Bagley, Inc., Naked Mobile, Photon by SBi

All business names previously used: CellularOne of NE Arizona, Smith Bagley, Inc. d/b/a Cellular One of North East Arizona, Smith Bagley, Inc d/b/a Cellular One of NE Arizona, SBi Arizona, LLC

Principals, affiliates, subsidiaries, and parent companies: Smith Bagley, Inc., SBi Broadband, LLC

Cellular One and Sunstate are not foreign voice service providers.

OCN: 4146

Individual responsible for addressing robocall mitigation-related issues:

Guy Turley, Chief Operating Officer
ETO Department
1500 South White Mountain Road, Suite 103
Show Low AZ 85901
+1 928-205-9999; Robocall@cellularoneaz.com

I, Guy Turley, Chief Operating Officer for Smith Bagley, Inc., submit this certification on behalf of Cellular One and Sunstate. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Guy Turley", written over a horizontal line.

Guy Turley, Chief Operating Officer

February 23, 2024

Robocall Mitigation

Cellular One has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic.

Cellular One retains TransNexus for monitoring all outbound voice traffic in real-time to mitigate robocalls. The software provides detailed reporting to identify suspected illegal robocalls. We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Sunstate has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic.

Sunstate retains Leap Frog Telecom L.L.C. d/b/a Voce Telecom for monitoring all outbound voice traffic in real-time to mitigate robocalls. The software provides detailed reporting to identify suspected illegal robocalls. We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Company monitors, through our Regulatory Compliance Department, the efforts of the Federal Trade Commission and the Federal Communication Commission regarding robocall mitigation efforts, requirements, identification of industry trends, provision of consumer education materials, and other related information and alerts.

Our Acceptable Use Policy prohibits utilizing our Cellular One and Sunstate services for deceptive purposes, engaging in fraudulent activities, and violating local, state, or federal laws.

Both Cellular One and Sunstate's Fair and Acceptable Use policies include "utilizing robocalling, autodialing, predictive-dialing or other software or technologies for illegal means" as a line item under prohibited use and is grounds for termination if warning is left unheeded.

Know-Your-Customer. Cellular One and Sunstate will adopt "Know Your Customer" initiatives to help mitigate the risk that its customers may attempt to use our network to initiate unlawful robocalling campaigns. These processes will include reasonable efforts to validate the identity of its customers, both residential and business. For residential voice customers we collect personally identifiable information, address, performing credit checks when required, monitoring payment performance and completion of company's Robocall Mitigation Compliance Certification. For commercial voice customers we collect information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, performing credit

checks when required, monitoring payment performance and understanding the nature of the customer's business including if/how they will employ auto-dialers or other robocall style tools in the conduct of their business by completing company's Robocall Mitigation Compliance Certification.

For voice residential customers, Company makes available free, easy-to-use call blocking and regularly engage in easily understandable outreach efforts to notify customers about these tools. We use best efforts to ensure that all tools offered safeguard customers' personal, proprietary, and location information.

All residential and business customers are only able to place calls originating from their own phone number.

Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Know-Your-Upstream Provider. Cellular One knows all carriers from which it receives traffic. Cellular One confirms that all connected providers are listed in the Robocall Mitigation Database. Cellular One shares call authentication data with connected service providers.

Traceback. Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

Cellular One of NE AZ Traceback Contact Information

24x7 NOC can be reached at +1 928-532-0082 and is designated to investigate robocalling incidents.

Sunstate Traceback Contact Information

Support Group can be reached at +1 888-368-2024 and is designated to investigate robocalling incidents.

Cellular One and Sunstate reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

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SENT

02 / 23 / 2024

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Sent for signature to Guy Turley (gturley@cellularoneaz.com)
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VIEWED

02 / 23 / 2024

16:00:05 UTC-7

Viewed by Guy Turley (gturley@cellularoneaz.com)
IP: 63.239.78.18



SIGNED

02 / 23 / 2024

16:00:20 UTC-7

Signed by Guy Turley (gturley@cellularoneaz.com)
IP: 63.239.78.18



COMPLETED

02 / 23 / 2024

16:00:20 UTC-7

The document has been completed.