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Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Delcambre Communications (“Delcambre”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Delcambre has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Specifically, Delcambre uses a screening process that includes:

- Enterprise- verifying the corporate entity and that the business purpose is legitimate.
- Telecoms- verifying that telephone numbers are legitimately used.
- Identity- verifying and updating Caller ID and verified calls.

In addition, although Delcambre’s customers generally do not generate a high volume of calls, were Delcambre to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

“Know-Your-Upstream Provider” Procedures

Most of the connections that Delcambre has with upstream providers have been in place for many years, and we know these companies very well. However, Delcambre exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using Delcambre to carry or process a high volume of illegal traffic. Specifically, Delcambre collects information such as the upstream provider’s physical business

location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Delcambre does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

Delcambre commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.