

Brantley Telephone Company, Inc -Robocall Mitigation Plan

Brantley Telephone Company, Inc, OCN 0347, 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).

Brantley Telephone Company, Inc. provides local service to fewer than 100,000 voice subscriber lines. Most customers are served on the IP portions of the Brantley Telephone Company, Inc. network which relies on technology that initiate, maintain, carry, process, and terminate SIP calls. To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Brantley Telephone Company, Inc. 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 Brantley Telephone Company, Inc.'s third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Consistent with § 64.6303(a)(1), Brantley is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, Brantley Telephone Company, Inc's non-IP network is connected to carriers that do not support IP connectivity; therefore, Brantley cannot upgrade those Non-IP portions of its network to IP connectivity.

All calls that originate on Brantley Telephone Company, Inc's network are subject to the described robocall mitigation program.

Brantley Telephone Company, Inc has contracted with TNS for its Call Guardian call analytics service to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and score the calls based on their behavior and/or their status as suspected robocalls. Any numbers that experience a change in reputation, such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic, will be investigated and identified as unlawful or legitimate.

Enforcement

If it is determined a Brantley Telephone Company, Inc customer is originating prohibited unlawful robocalls on our network, Brantley Telephone Company, Inc will either warn the customer to stop or terminate their service as allowed per Brantley Telephone Company, Inc's policies that define the circumstances by which Brantley Telephone Company, Inc will suspend or terminate service to a customer. The policies can be viewed here: Robocall Policy - Brantley Telephone Company (btconline.net).

Traceback

Brantley Telephone Company, Inc is committed 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. Brantley Telephone Company,

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

Upstream Provider Knowledge

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

Customer Vetting

Brantley Telephone Company, Inc has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Brantley Telephone Company, Inc 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.

Customer Education

Brantley Telephone Company, Inc posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity. [Robocall Policy - Brantley Telephone Company \(btconline.net\)](#)