

Robocall Mitigation Plan

This robocall mitigation plan is ITS Telecommunications Systems, LLC dba Blue Stream Fiber, with headquarters at 15925 SW Warfield Blvd, Indiantown, Florida 34956.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that the upstream provider has a reasonable robocall mitigation plan, including a vetting process for its customers and upstream providers, and uses call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

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.

STIR/SHAKEN

We have registered with the STI-PA using OCN 0331. We have our own STIR/SHAKEN certificate issued by TransNexus STI-CA. We have implemented STIR/SHAKEN using an STI-AS and STI-VS supplied by TransNexus.

ITS Telecommunications Systems, LLC dba Blue Stream Fiber is eligible for the continuing extension of the STIR SHAKEN implementation deadline on non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

ITS Telecommunications Systems, LLC dba Blue Stream Fiber provides local service to fewer than 100,000 voice subscriber lines. Most customers are served on the non-IP portions of ITS Fiber, LLC dba Blue Stream Fiber's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

ITS Telecommunications Systems, LLC dba Blue Stream Fiber's non-IP network is connected to carriers that do not support IP connectivity; therefore, ITS Telecommunications Systems, LLC dba Blue Stream Fiber cannot upgrade those non-IP portions of its network to IP connectivity.

Consistent with § 64.6303 (a)(1), ITS Telecommunications Systems, LLC dba Blue Stream Fiber 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. ITS Telecommunications Systems, LLC dba Blue Stream Fiber has contacted all its connected carriers and requested to convert the non-IP connections to IP connections. The carriers stated they cannot support IP connections at this time.