

Robocall Mitigation Plan Description for H&B Communications, Inc. (H&B)

1. H&B 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. H&B 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. H&B has taken the following specific steps to detect originating robocall traffic:
 - a. Monthly originating call volumes will be tracked and compared to historical call volumes. Any changes or irregularities will be investigated to find the source and identify legitimacy.
4. H&B has taken the following steps to prevent illegal originating robocalling traffic:
 - a. H&B confirms the identity of all our customers and collects their physical location information, type of business and individual contacts during the signup process. We also do all of our own installs onsite for voice services.
 - b. H&B collects identity and location information from its customers when renewing contracts or adding new lines/services.
 - c. H&B has added provisions to its end-user terms to prevent its customers from originating illegal traffic. These provisions specifically prohibit illegal traffic including automatically dialed voice calls and messages.
5. H&B has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
 - a. Customers found to be originating illegal robocalls will be contacted as soon as is feasible. They will be notified of the illegal traffic and asked to immediately cease illegal robocalls.
 - b. Customers will also be informed that repeated offenses may result in termination of service. If there are repeat offenses, then suspension or termination of services will be implemented.
6. H&B has taken the following steps to avoid carrying or processing illegal robocalls:
 - a. It only accepts traffic from known upstream providers.
7. H&B identifies and blocks illegal traffic without using any specific call analytics systems. It monitors its own traffic using internal software to identify anomalous traffic patterns.