

Doylestown Communications, Inc. Robocall Mitigation Plan

This document provides details on Doylestown Communications, Inc.'s robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

Doylestown Communications, Inc., Operating Company Number 849C, is a voice service provider with a STIR/SHAKEN obligation serving end-users. It has fully implemented STIR/SHAKEN, has met its obligations and is not eligible for any extension.

Robocall Mitigation Plan

All voice traffic that originates on Doylestown's network is subject to the following Robocall Mitigation Plan.

Reasonable Steps

Doylestown Communications, Inc. monitors all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are analyzed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short time frame
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Doylestown Communications, Inc. retains the originating and terminating call detail usage records for a minimum of ten years.

Investigation

Doylestown Communications, Inc. investigates calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls.

As of this filing Doylestown has not had any originating robocalls detected in its network by the internal analytics. Nor has Doylestown received any complaints from its customers.

Enforcement

If it is determined that a Doylestown customer is in violation of its acceptable use policy in any part of its network, Doylestown will either warn the customer to stop such practices or terminate their service.

Know Your Customer

Doylestown Communications, Inc. has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. Doylestown Communications, Inc. vets all residential and business customers, validates their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

Contractual Provisions with End-users

All new customers acknowledge a statement on the service application which states users are prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

Upstream Provider Knowledge

Doylestown knows all carriers from which it receives traffic. Doylestown has confirmed that all carriers in which Doylestown exchanges traffic are listed in the Robocall Mitigation Database.

Doylestown has reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Roll In the Call Chain

Doylestown Communications, Inc. is a voice service provider with the STIR/SHAKEN.

Traceback

Doylestown Communications, Inc. is committed to cooperation with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. Doylestown will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within 24 hours.

Robocall Mitigation Database Eligibility

Doylestown Communications, Inc. has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Doylestown Communications, Inc. has not been prohibited from filing in the Robocall Mitigation Database (RMD).