



Oregon-Idaho Utilities Inc. d/b/a E4 Connect Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Oregon-Idaho Utilities Inc. d/b/a E4 Connect (“E4 Connect”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic. E4 Connect’s voice services are provided over both time division multiplexing (TDM) and Internet protocol (IP) technologies. TDM-based voice service is provided over switches owned and controlled by E4 Connect. However, voice over IP (VoIP) service is provided via Toly Digital Networks, Inc.’s Cloud Switch Services. Toly Digital Networks performs all switching operations for E4 Connect’s VoIP service. Therefore, E4 Connect does not have control over the network infrastructure necessary to implement STIR/SHAKEN on its VoIP service. Implementation of the STIR/SHAKEN framework on calls made by E4 Connect’s VoIP customers is performed by Toly Digital Networks.

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

E4 Connect has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. E4 Connect’s business customers are all small businesses that are physically located in our service territory. Prior to a new business customer ever making a call, we personally know, or get to know, the business owners and/or management. This personal touch gives E4 Connect a clear view of whether the business is a risk for originating illegal robocalls.

E4 Connect has never received a request for high-volume origination services. However, were E4 Connect to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to granting access to the service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, E4 Connect customers with TDM-based voice service are only able to originate calls from a number that identifies in the company’s switches as a number that has been assigned to them. This prevents these customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on E4 Connect’s network.



Know-Your-Upstream Provider” Procedures

Currently, the only upstream providers from which E4 Connect receives traffic on its TDM switches are Lumen Technologies and AT&T. E4 Connect’s connections with these providers have been in place for many years, and we know them very well. Before accepting traffic from any new upstream provider, E4 Connect would exercise due diligence and seek to ensure that the provider is not using E4 Connect to carry or process a high volume of illegal traffic. Specifically, E4 Connect would collect 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.

With regard to calls terminating to E4 Connect’s VoIP customers, we rely upon the “know-your-upstream provider” procedures of Toly Digital Networks, whose Cloud Switch Services E4 Connect uses to offer VoIP service. E4 Connect is confident that Toly Digital Networks exercises due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

Toly Digital Networks partners with TransNexus to monitor E4 Connect’s outbound VoIP traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. E4 Connect immediately investigates any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

With regard to E4 Connect’s TDM-based voice service, we have implemented Cordell/Nex-Tech’s Voice Quality Measurements Module (VQM). The VQM module accesses the data stored within our call detail server and generates specific reports which help E4 Connect to identify potential robocalls originating from and terminating to our voice network. The system generates reports on daily calls to 911, incoming and outgoing international calls, excessive calls, and repeat calls. Suspect calls are investigated and if it is determined that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Commitment to Respond to Traceback Requests

E4 Connect 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 any illegal robocallers that use its services to originate, carry, or process illegal robocalls.