

DMEA Utilities Services LLC (dba Elevate Internet) Robocall Mitigation Plan

Date: February 20, 2024

DMEA Utilities Services LLC (DMEAUS) uses Alianza, Inc. (Alianza) as its underlying voice services provider. Accordingly, DMEAUS relies on procedures, policies, and safeguards implemented by Alianza to ensure that DMEAUS's residential and business customers are sufficiently protected against robocall and spoofing activities.

Traceback

DMEAUS responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

STIR/SHAKEN

DMEAUS has fewer than 100,000 voice subscriber lines, and therefore was not required to implement STIR/SHAKEN until June 30, 2023, however, DMEAUS was compliant to STIR/SHAKEN requirements before the deadline through its underlying carrier (Bandwidth) certifying all outbound calls using their certificate and validating all inbound certificates. The remainder of the voice traffic that DMEAUS originates on its network is subject to Alianza's robocall mitigation program described below.

Robocall Mitigation Program

Alianza's platform prevents users from "spoofing" CallerID by only allowing accounts to use telephone numbers that they own as CallerID (which is the primary technique used by illegal robocallers). Alianza also monitors DMEAUS's outbound voice traffic to alert for spikes in usage to be investigated for bad actors. The alerts identify calling patterns that would indicate robocall activity, such as an unusual number of calls from a telephone number and/or an unusual number of short duration or incomplete calls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then DMEAUS either warns them to stop or terminates their service, as appropriate pursuant to its Acceptable Use Policy.