



Gervais Telephone Company d/b/a DataVision Communications Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Gervais Telephone Company d/b/a DataVision Communications (DataVision) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

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

DataVision has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. DataVision vets the identity of all new residential and business customers.

DataVision is a small local company with approximately 700 voice lines. Prior to a new business customer ever making a call on DataVision’s network, we personally know, or get to know, the business owners and/or management. This relationship building gives DataVision a clear view of whether or not the business presents a risk for originating illegal robocalls.

DataVision’s business customers are mostly small businesses that are physically located in our service territory. As a result, DataVision has never received a request for high-volume origination services. However, were DataVision to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing 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.

DataVision monitors call origination volume on customer lines and works with its billing vendor, National Information Solutions Cooperative., to monitor for outgoing call patterns that are consistent with illegal robocall campaigns and fraudulent calls. If, upon investigation, DataVision were to determine that a customer was using their service to make illegal calls, we would act quickly to put an end to the unlawful activity and may suspend or terminate the customer’s service as appropriate.

In addition, DataVision’s contracts with business customers, as well as our general terms and conditions of service, expressly prohibit services from being used for any illegal, fraudulent, improper, or abusive purpose. In particular, the documents state that DataVision may suspend or terminate service for creating false caller identity (caller ID spoofing) and for using a voice line in excess of what, in DataVision’s discretion, would be expected of normal business use. DataVision would not hesitate to enforce this policy if necessary.

“Know-Your-Upstream Provider” Procedures

DataVision has connections with only a few upstream providers. These connections have been in place for many years and we know these providers very well. Before accepting traffic from any new upstream provider, DataVision would exercise due diligence and seek to ensure that the provider is not using DataVision to carry or process a high volume of illegal traffic. Specifically, DataVision 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.

Use of Call Analytics Systems

DataVision does not presently use any call analytics systems to identify and block illegal robocall traffic.

Commitment to Respond to Traceback Requests

DataVision 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 illegal robocallers that use its service to originate, carry, or process illegal robocalls.