

BACA VALLEY TELEPHONE CO., INC ROBOCALL MITIGATION PLAN

Baca Valley Telephone Co., Inc (BVT) Operating Company Number (2259) is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

BVT provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of BVT's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

BVT also originates calls via SIP connections within its network. BVT has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. BVT has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of BVT's network.

BVT has implemented the following robocall mitigation program to detect and prevent unlawful robocalls from originating on its network. All calls that originate on BVT's network are subject to the described robocall mitigation plan.

Robocall Mitigation Plan

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

Call Analytics

BVT has contracted with JSI, LLC for Robocall Origination Detection Service. JSI downloads BVT's CDRs and check for patterns indicative of originating robocalls. JSI provides BVT a report identifying any suspected illegal robocall activity for investigation.

Investigation

BVT promptly investigates calls identified as potential illegal robocalls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if BVT has any other reason to suspect illegal robocalling or spoofing is taking place over its network, BVT will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a BVT customer is using our network to fraudulently spoof calls or to originate illegal robocalls, BVT will immediately mitigate the illegal robocall traffic by either warning the customer to stop such practices or terminating their service as allowed per BVT policy.

All BVT customers receive notice of our company's prohibited use of its network for the initiation of fraudulent spoofing and robocalls. If the customer is found in violate of the prohibited use terms, their service may be terminated.

Know your Customer

BVT has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. BVT thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Upstream Provider Knowledge

BVT knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. BVT has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. In addition, BVT is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Role In the Call Chain

BVT is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. BVT is also a voice service provider without a STIR/SHAKEN obligation on the Non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Traceback

BVT commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. BVT 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 twenty-four (24) hours.

Robocall Mitigation Database Eligibility

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

BVT has not been prohibited from filing in the Robocall Mitigation Database (RMD).