

Waitsfield-Fayston Telephone Co., Inc.
d/b/a Waitsfield and Champlain Valley Telecom

Robocall Mitigation Policy
February 20, 2025

Waitsfield-Fayston Telephone Co., Inc., d/b/a Waitsfield and Champlain Valley Telecom (WCVT) is an incumbent local exchange carrier in Vermont. WCVT is a voice service provider with both TDM and SIP services in its network and fewer than 100,000 subscribers.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

WCVT 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).

WCVT is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as WCVT's third-party representative on the ATIS Non-IP taskforce working group

Status of STIR/SHAKEN Implementation

WCVT has implemented authentication and verification with STIR/SHAKEN voice traffic that is delivered as IP to its underlying interexchange partner through attestation services provided on a hosted basis by its carrier. The traffic that is TDM remains subject to its robo call mitigation plans.

II. Robocall Mitigation

WCVT is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. WCVT uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which WCVT are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

General Prohibition Against Illegal Robocalling

WCVT's end user services are subject to terms and conditions contained on its website under Company Policies and Forms. WCVT specifically prohibits activities normally associated with robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using WCVT's network;
- service to engage in or in connection with fraudulent activities

WCVT customers are notified that it has the right to suspend or terminate service for violation of the company's policies.

Know Your Customer

WCVT utilizes the mitigation technique of "Know Your Customer". WCVT is a small rural telephone company that maintains a close relationship with its customers and community. Very few of WCVT's

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customers have enough call paths to generate the high volume of call traffic associated with robocalling allowing WCVT to directly communicate with these customers about robocalling.

WCVT does not provide voice origination services to third party carriers; all voice origination products are provided directly to end users.

WCVT has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- WCVT will visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling
- WCVT specifically communicates with large volume customers, emphasizing that our policies include robocalling language that allows the company to investigate / suspend / or terminate service to customers engaged in robocalling and to share calling information about the customer should we receive a complaint of robocalling.

WCVT does provide a subscription-based, non-commercial legal robocalling product and has directly contacted those subscribers (which include churches, school systems) to educate them about legal versus illegal robocalling activities to insure they continue to remain compliant in their use of the product.

WCVT serves a small number of long-time business end users with large volume calling capability who are being directly contacted to review WCVT's policies and efforts to prevent WCVT's network from being used for illegal robocalling.

Analytics

WCVT uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts WCVT to outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

The same mitigation steps are applied for all outbound calls regardless of WCVT's role in the call chain for a particular call.

WCVT immediately investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If it is determined that the traffic was likely unlawful, then the originator is warned to stop sending such traffic. If they continue to send traffic that appears to be unlawful, service is terminated.

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III. Traceback

WCVT will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group. The company commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither WCVT nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.