

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, **Block Line Systems LLC** submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **Block Line Systems LLC** will have in place to mitigate illegal robocalls as of December 12, 2024. **Block Line Systems LLC** may modify, add, delete, or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities, and its needs.

Block Line Systems LLC is an originating and terminating, intermediate service provider. **Block Line Systems LLC** has never claimed a STIR/SHAKEN implementation extension or exemption. **Block Line Systems LLC** has not been prohibited from filing in the Robocall Mitigation Database. **Block Line Systems LLC** (and/or any entity for which the filing entity shares common ownership, management, directors, or control) has never 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. **Block Line Systems LLC** is not a foreign voice service provider.

Other Business Names in Use By Service Provider:

Telesystem

Infinite Communication LLC

STIR/SHAKEN Implementation

Block Line Systems LLC will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Block Line Systems LLC is implementing STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

Block Line Systems LLC has implemented this solution in the IP portions of its network as of June 30, 2021.

- ☒ Our traffic will be fully attested.
- ☒ Our traffic will be partially attested.
- ☒ The Robocall Mitigation Plan outlined below will be implemented.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that **Block Line Systems LLC** has implemented to detect and prevent illegal robocalls on its network. **Block Line Systems LLC** certifies that all calls that it originates on its network are subject to a robocall mitigation program, and has not had any prior certification removed by FCC action. **Block Line Systems LLC** will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment

Block Line Systems LLC is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and **Block Line Systems LLC** has not received information suggesting that robocalls are originated on its network. Therefore, **Block Line Systems LLC** does not consider its network at high risk of originating illegal robocalls.

Specific Measures to Identify and Prevent Illegal Robocalls

Customer Due Diligence: **Block Line Systems LLC** conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- **Block Line Systems LLC** verifies customer's credit history and business reputation prior to providing service.
- **Block Line Systems LLC** verifies customer information when contracts are renewed, or services are added.
- **Block Line Systems LLC** has significant contractual provisions regarding fraud and illegal activity conducted on its networks.
- **Block Line Systems LLC** verifies the customer's identity and their right to use the telephone number presented on calls.
- **Block Line Systems LLC** has the policies that define the circumstances by which it will deny, suspend, or terminate service to a customer.
- **Block Line Systems LLC** wholesale customers require a USF/Reseller Exemption Certificate or Tax Exemption form.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **Block Line Systems LLC** has in place an enforceable term of use and/or an acceptable use policy. **Block Line Systems LLC** also has in place policies designed to detect and prevent fraudulent traffic on its network. **Block Line Systems LLC** does not sell service to international call originators using NANP numbers.
- **Block Line Systems LLC** uses TNS Call Guardian analytics, technologies, and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **Block Line Systems LLC** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if

effective action is not taken, **Block Line Systems LLC** can suspend and/or terminate service to the customer.

- **Block Line Systems LLC** has service agreements with Bandwidth.com, IntelPeer, Sinch, Peerless Networks, Lumen, ANI Networks, and Tata Communications. They have stated they will abide by the FCCs STIR/SHAKEN and robocalling mitigation rules in all respects when providing voice services to **Block Line Systems LLC**. They, along with **Block Line Systems LLC** have committed to work together to mitigate all illegal robocalls.
- **Block Line Systems LLC** blocks the following types of calls by default:
 - ☒ Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order, FCC-CIRC1711-01]
 - ☒ Calls from DNO numbers as per FCC Order [2017 Call Blocking Order, FCC-CIRC1711-01]

Responding to Traceback Requests

- **Block Line Systems LLC** will respond within 24 hours to inquiries received from the FCC, law enforcement agencies, and the Industry Traceback Group, and dedicate sufficient resources to provide prompt and complete information. If a pattern of questionable activity is detected, **Block Line Systems LLC** will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.
- **Block Line Systems LLC** uses Metaswitch Service Assurance Server to record call signaling, and data from GCS and Metaswitch CDRs to allow for traceback activities. We also utilize Equinix Protector to identify fraudulent patterns such as domestic traffic pumping.
- **Block Line Systems LLC** has designated individuals as dedicated points of contact for addressing traceback requests. **Block Line Systems LLC** contacts for robocall mitigation issues are:

Mike Wasicsko
Principal Engineer, Voice Engineering
c/o Denton Parson
2700 Oregon Rd, Northwood OH 43619
419-720-4272
mwasicsko@trusttelesystem.com

Nikki Sweeney
VoIP Engineer II
1 Braxton Way, Ste 150, Glen Mills PA 19342

610-355-9775
nsweeney@trusttelesystem.com

Cooperation with State and Federal Regulators

Block Line Systems LLC will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **Block Line Systems LLC** will:

- Respond to valid law enforcement requests.
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Block Line Systems LLC is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Business Identifying Information

Block Line Systems LLC is a subsidiary of Block Communications Inc, DBA Telesystem. Its headquarters is located at 2700 Oregon Rd, Northwood OH 43619, with a mid-Atlantic regional office at 1 Braxton Way, Ste 150, Glen Mills PA 19342.

James Maloney
BCI, VP of Telecom
President, Telesystem

Denton Parson
EVP and COO, Telesystem

Stu Livolsi
Director of IP and Voice Engineering, Telesystem

Signed by:

Denton Parson

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Sincerely,
[Officer of the Company]

Date Signed: February 5, 2026