

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, **Buckeye Telesystem Inc** 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 **Buckeye Telesystem Inc** will have in place to mitigate illegal robocalls as of December 12, 2024. **Buckeye Telesystem Inc** 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.

Buckeye Telesystem Inc is an originating and terminating, intermediate service provider. **Buckeye Telesystem Inc** has never claimed a STIR/SHAKEN implementation extension or exemption. **Buckeye Telesystem Inc** has not been prohibited from filing in the Robocall Mitigation Database. **Buckeye Telesystem Inc** (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. **Buckeye Telesystem Inc** is not a foreign voice service provider.

Other Business Names in Use By Service Provider:

Buckeye Cablevision, Inc
Block Line Systems LLC
Telesystem

STIR/SHAKEN Implementation

Buckeye Telesystem Inc 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.

Buckeye Telesystem Inc 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).

Buckeye Telesystem Inc 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 **Buckeye Telesystem Inc** has implemented to detect and prevent illegal robocalls on its network. **Buckeye Telesystem Inc** 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. **Buckeye Telesystem Inc** 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

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

Specific Measures to Identify and Prevent Illegal Robocalls

Customer Due Diligence: **Buckeye Telesystem Inc** 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.

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

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **Buckeye Telesystem Inc** has in place an enforceable term of use and/or an acceptable use policy. **Buckeye Telesystem Inc** also has in place policies designed to detect and prevent fraudulent traffic on its network. **Buckeye Telesystem Inc** does not sell service to international call originators using NANP numbers.
- **Buckeye Telesystem Inc** uses TNS Call Guardian analytics, technologies, and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **Buckeye Telesystem Inc** 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, **Buckeye Telesystem Inc** can suspend and/or terminate service to the customer.

- **Buckeye Telesystem Inc** 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 **Buckeye Telesystem Inc** have committed to work together to mitigate all illegal robocalls.
- **Buckeye Telesystem Inc** 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

- **Buckeye Telesystem Inc** 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, **Buckeye Telesystem Inc** 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.
- **Buckeye Telesystem Inc** uses Emprix to record call signaling, and data from GCS and Broadworks CDRs to allow for traceback activities. We also utilize Equinox Protector to identify fraudulent patterns such as domestic traffic pumping.
- **Buckeye Telesystem Inc** has designated individuals as dedicated points of contact for addressing traceback requests. **Buckeye Telesystem Inc** 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

William Ruckman
VoIP Engineer II
2700 Oregon Rd, Northwood OH 43619
419-724-3836

wruckman@trusttelesystem.com

Cooperation with State and Federal Regulators

Buckeye Telesystem Inc will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **Buckeye Telesystem Inc** 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.

Buckeye Telesystem Inc is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Business Identifying Information

Buckeye Telesystem Inc 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