

**Wiggins Telephone Association d/b/a Blue Lightning
Northern Colorado Communications, LLC d/b/a Blue Lightning
Robocall Mitigation Program**

Wiggins Telephone Association (WTA) and its wholly owned subsidiary, Northern Colorado Communications, LLC (NCC) (collectively, “Blue Lightning”) are small telecommunications service providers located in northeast Colorado. The service areas of the Blue Lightning companies are heavily agricultural in nature. Single-line residential customers comprise the large majority of the customer base and the majority of business customers are agriculture related or oil/energy companies. As of January 1, 2026, WTA served a total of 2,037 voice lines served by the Blue Lightning companies.

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

Blue Lightning has received the following types of extensions of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC’s rules: (1) the small voice service providers extension (§64.6304(a)), and (2) the non-IP networks extension (§64.6304(d))

Additionally, the *Second Caller ID Authentication Report and Order*, 36 FCC Rcd 1859, 1868, para. 19 (2020) (“...voice service providers which lack control over the network infrastructure necessary to implement STIR/SHAKEN are not subject to our implementation requirements.”), also applies to the companies.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps Blue Lightning has taken to avoid originating illegal robocall traffic.

1. *Know-Your-Customer Policy*: Blue Lightning vets the identity of its customers in order to prevent bad actors from utilizing its network. Blue Lightning’s small size enables our staff to keep a watchful eye on new customers. In addition to the customary due diligence performed on residential customer applications, Blue Lightning customer service representatives (CSRs) confirm the identity of new business customers by collecting information such as their physical location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer’s business. CSRs have been instructed to alert management for any abnormal applications for service that could be potential bad actors. At Blue Lightning’s discretion, new customers seeking access to high-volume origination services will be extensively investigated prior to service being connected. According to Blue Lightning’s Terms of Service as posted on the Company’s website, these customers may have their services terminated in the instance that these services are abused by new or existing customers.

2. Know -Your-Upstream-Provider Policy: Blue Lightning has implemented a “know your upstream provider” process that includes exercising due diligence prior to accepting traffic from such providers. This process includes, but is not limited to, collecting information from upstream providers such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the upstream provider’s business. If and when necessary, Blue Lightning will take additional steps, such as adopting contract terms and conditions that allow for the termination of a provider’s traffic in the event the upstream provider attempts to use Blue Lightning’s network to carry or process a high volume of illegal traffic.
3. Network Monitoring: Blue Lightning does not use any call analytic system or provider per se to identify and block illegal robocall traffic. However, Blue Lightning monitors its originating voice traffic for potential illegal robocall activity. Blue Lightning’s billing company vendor has practices in place that would flag a large increase in a customer’s originating calls, regardless of the length of the calls. As part of its normal data collection, the billing company downloads the originating call data records of Blue Lightning’s customers from the voice switching platform and analyzes them to identify any abnormal patterns. If an abnormal pattern was identified, the billing company would then research the calls and contact Blue Lightning to investigate whether the traffic was valid. The billing company also watches trends in toll calls and would catch a large increase in toll call volume. Toll reports can be generated that list the highest toll callers by minutes and revenue and flag any significant increases in usage, thereby helping to identify abusers.
4. Terms of Service: Blue Lightning’s Terms of Service, posted on the company’s website, states that voice service customers that are identified as violators of the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act will potentially be subject to enforcement actions by the FCC, appropriate law enforcement, and termination of service. In addition, any customer that Blue Lightning identifies as originating robocalls will be contacted, their toll records investigated, and potentially have their service terminated if corrective measures are not taken to eliminate future issues. The FCC’s Enforcement Bureau would also be contacted for appropriate action to be taken against the offending subscriber.
5. Traceback Request: Blue Lightning has processes in place to ensure it responds within 24 hours, to any traceback request from the FCC, civil or criminal law enforcement agents, 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. Blue Lightning has designated a traceback response contact(s) who are aware of the traceback requirements contained in 47 C.F.R. §64.1200(n)(1) and the obligations contained in 47 C.F.R. §64.1200(n)(2) in the event the Company receives notification of a traceback request.

a. Upon receipt of any traceback request, Blue Lightning will take steps to promptly investigate the traffic, and if a notice is received as outlined in FCC rules, will also take steps to effectively mitigate the illegal traffic.

b. If Blue Lightning determines that the identified traffic is not illegal, it will provide an explanation in the report it submits to authorities as to how Blue Lightning reached this conclusion.

c. If Blue Lightning determines that the identified traffic came from another voice provider with direct access to the United States public switched telephone network, the report will identify that voice service provider and the notified voice service provider should take mitigation steps if possible, or

d. If Blue Lightning does not reach either of these conclusions (b or c above), its report will include the steps take to effectively mitigate this traffic.

As of June 30, 2023, Wiggins Telephone Association and its wholly owned subsidiary, Northern Colorado Communications, LLC (collectively, “Blue Lightning”) only uses non-IP technology that cannot initiate, maintain, and terminate SIP calls, making it incompatible with STIR/SHAKEN. Thus, Blue Lightning is unable to implement STIR/SHAKEN in any part of its network at this time and must continue to avail itself of the non-IP networks extension under §64.6304(d) of the FCC’s rules. Blue Lightning will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol has been fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.