



Big Bend Telecom, LTD - Robocall Mitigation Program

Big Bend Telecom, LTD,(BBT) Operating Company Number 193H, 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).

BBT provides local service to fewer than 100,000 voice subscriber lines. Most customers are served on the IP portions of BBT's network.

Company Information

Big Bend Telecom, LTD provides a hosted voice solution using cloud-based VoIP services provided by Toly Digital. Big Bend Telecom LTD is registered with the Policy Administrator under the name of BBT and is an authorized provider in the STIR/SHAKEN framework. Ribbon Communications is Big Bend Telecom LTD's STI-Certificate Authority (STI-CA). Toly Digital authenticates all originating IP calls on the BBT network with the BBT certificate.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Big Bend Telecom, LTD is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Big Bend Telecom, LTD's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Robocall Mitigation Plan

Call Analytics

BBT has contracted with Toly Digital, which uses call analytics software provided by TransNexus to monitor our outbound voice traffic to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Our cloud-based VoIP services and provides a variety of tools/filters customers can use to mitigate inbound robocalls, to include STIR/SHAKEN attestation information when available.

Know Your Customer

Big Bend Telecom, LTD's Know Your Customer procedures incorporate the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

The Big Bend Telecom, LTD practices include:

BBT has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. BBT 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.

Residential Voice customers are asked to provide their full name, address (physical and mailing, if different), date of birth, phone number, email, and establish a security PIN. To initiate an account change, a customer must be an authorized agent on the account and provide the account pin or answer a security question prior to initiating a change

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must be an authorized agent on the account and provide the account pin or answer the security question prior to initiating a change. If the customer is unable to provide that information, the customer service representative will call an authorized agent to confirm the requested change and to update the authorized agents on the account.

Upstream Provider Knowledge

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

Role In the Call Chain

BBT is a voice service provider with a STIR/SHAKEN implementation obligation on the IP-Portions of its network. BBT 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

Big Bend Telecom, LTD will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. Big Bend Telecom LTD commits to

responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

RMD Filing/Investigation History

Big Bend Telecom, LTD has not been prohibited from filing in the Robocall Mitigation Database and has not been involved with any recent formal law enforcement or regulatory investigation into suspected unlawful robocalling.