

BRAZORIA TELEPHONE COMPANY ROBOCALL MITIGATION PLAN

Brazoria Telephone Company (Brazoria), Operating Company Number (2040), 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). To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), Brazoria Telephone Company is a member of NTCA and 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 Brazoria Telephone Company's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

Brazoria provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Brazoria's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Brazoria also originates calls via SIP connections within its network. Brazoria has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Brazoria has implemented STIR|SHAKEN within its IP-network and signs the calls originating on the IP portions of Brazoria's network.

Robocall Mitigation Plan

All voice traffic that originates on Brazoria's network is subject to the following Robocall Mitigation Plan.

Call Analytics

Brazoria is not working with a vendor to provide robocall analytics.

Internal Traffic Monitoring & Analytics

Brazoria monitors all originating network traffic for suspicious or abnormal call pattern, volume or activity. Calls that meet the below qualifying factors are investigated internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a short timeframe
- Short duration calls
- Low average call duration
- Low call completion ratios
- Sequential dialing patterns

Brazoria blocks the origination of calls from numbers that are not valid NANP numbers. Examples of such invalid numbers include those that use an unassigned area code; that use an abbreviated dialing code, such as 91155 or 411, in place of an area code; that do not contain the requisite number of digits; and that are a single digit repeated, such as 000-000-0000, with the exception of 888-888-8888, which is an assignable number. Brazoria also blocks the origination of calls from telephone numbers on its internal Do Not Originate (DNO) list as requested by the customer assigned the telephone number.

Investigation

Brazoria investigates calls identified by its internal traffic monitoring as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Brazoria has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Brazoria will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing are prohibited on our network. If it is determined a Brazoria customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Brazoria will either warn the customer to stop such practices or terminate their service as allowed per Brazoria policy.

All Brazoria customers that accept our network services are bound to our Acceptable Use Policy. The service arrangement includes notice that Brazoria prohibits use of its network for the initiation of fraudulent spoofing and robocalls and if end users are found in violate of the service terms, the end user's service may be terminated.

Know your Customer

Brazoria has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Brazoria 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 customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. 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 provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup.

Upstream Provider Knowledge

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

Role In the Call Chain

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

Brazoria commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Brazoria commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within 24 hours.

Robocall Mitigation Database Eligibility

Brazoria has not, within the prior two years, been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Brazoria has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Brazoria posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and a process to report complaints related to robocall activity.