

Bretton Woods Telephone Company and World Surfer Robocall Mitigation Plan

This document provides details on Bretton Woods Telephone Company and World Surfer's robocall mitigation processes, procedures, and commitments as required by the Federal Communications Commission.

Bretton Woods Telephone Company, 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).

Bretton Woods Telephone Company and World Surfer provide service to fewer than 100,000 voice subscriber lines. All customers served on the non-IP portions of the network which relies on TDM technology that cannot initiate, maintain, or terminate SIP calls.

To meet the non-IP network criteria for the continuing STIR/SHAKEN extension §64.6303(a)(2), Bretton Woods Telephone is an active member of the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force which developed the non-IP call authentication solutions.

Robocall Mitigation Plan

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

Reasonable Steps

We monitor all originating network traffic call detail records for suspicious or abnormal call pattern, volume, or activity. Calls that meet the below qualifying factors are reviewed internally to determine if the calls are legitimate or unlawful:

- High-volume voice network traffic
- Large bursts of calls in a brief period
- Short duration calls
- Low average call duration
- Low call completions ratios
- Sequential dialing patterns
- Neighbor spoofing patterns

Investigation

We investigate calls identified by internal traffic monitoring processes as suspicious or abnormal consistent with illegal robocalls. As of this filing Bretton Woods and World Surfer have not had any originating robocalls detected in its network by internal analytics. Nor have Bretton Woods or World Surfer received any complaints from its customers.

Enforcement

If it is determined that a customer is in violation of its acceptable use policy in any part of its network, we will either warn the customer to stop such practices or terminate their service.

Know Your Customer

Bretton Woods and World Surfer have procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls. We verify our residential and business customers; validate their identity, physical location, and contact personal information. Also, personally identifiable questions may be asked to provide additional security.

Contractual Provisions with End-users

All new customers acknowledge a statement on the service application which states, users will be prohibited from originating unwanted calls with the intent to defraud, cause harm, or wrongly obtain anything of value from the called party. If any customer is found in violation of the company's robocall mitigation policy the end users service may be terminated.

Upstream Provider Knowledge

We know our carriers from which we receive traffic. We confirmed that carriers which exchange traffic are listed in the Robocall Mitigation Database. We have reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

Roll In the Call Chain

Bretton Woods Telephone Company and World Surfer are voice service provider without the STIR/SHAKEN obligation in its Non-IP network because our network relies on technology that cannot initiate, maintain, carry, process, or terminate SIP calls.

Traceback

Bretton Woods and World Surfer are committed to cooperating with all legal and legitimate industry inquiries to potential invalid or illegal traffic originating from its network. We will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within 24 hours.

Robocall Mitigation Database Eligibility

Bretton Woods Telephone Company and World Surfer have not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Bretton Woods Telephone Company and World Surfer are not prohibited from filing in the Robocall Mitigation Database (RMD).