



BCI MISSISSIPPI BROADBAND, LLC d/b/a MaxxSouth Broadband

[Robocall Mitigation Program](#)

September 2025 Version

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I. Robocall Mitigation Program Introduction

BCI Mississippi Broadband offers interconnected VoIP services to its subscribers on a resold basis using the services of IDT Telecom, Inc. While BCI Mississippi Broadband, LLC necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by IDT, BCI Mississippi Broadband, LLC has adopted the following Robocall Mitigation Program (“RMP”) to attempt to prevent unlawful robocalls from originating on, terminating to, or routing through BCI Mississippi Broadband, LLC voice networks where it is operating as a Voice Service Provider. Unless defined differently herein, capitalized terms used herein have the same definitions as set forth under 47 C.F.R § 64.6300.

A. Company Summary

BCI Mississippi Broadband, LLC is an Ohio limited liability company. BCI Mississippi Broadband, LLC is also covered under this RMP and BCI Mississippi Broadband, LLC has included the FCC Registration Number in its RMD filing, which is also listed in Exhibit A to this RMP.

BCI Mississippi Broadband, LLC offers state-of-the-art digital video, high-speed data, residential and commercial telephony, including hosted private branch exchange (“PBX”). Our customers can subscribe to these services individually or through service bundles that deliver different combinations of video, internet and phone services. As indicated above, depending on the services provided, BCI Mississippi Broadband, LLC may serve as Voice Service Provider, Intermediate Provider, and/or Gateway Provider.

B. Filing of RMP and Implementation of STIR/SHAKEN

BCI Mississippi Broadband, LLC is exempt from a STIR/SHAKEN implementation obligation. BCI Mississippi Broadband, LLC lacks control over the network infrastructure necessary to implement STIR/SHAKEN. See First Caller ID Authentication Report and Order, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

II. Robocall Mitigation Program

This RMP describes BCI Mississippi Broadband, LLC policies and procedures to engage to attempt to avoid carrying or processing illegal robocall traffic:

- (1) Implementing Know-Your-Customer Protocols
- (2) Requiring Contractual Provisions to Mitigate Illegal Robocalls
- (3) Only Accepting Traffic from Providers in the RMD/ Know-Your-Upstream Provider Protocols
- (4) Blocking Calls on a Do-Not-Originate List
- (5) Analyzing and Monitoring Network Traffic Routing Through BCI Mississippi Broadband, LLC Network
- (6) Responding to Commission, Law Enforcement and ITG Traceback Requests
- (7) Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues
- (8) Updating BCI Mississippi Broadband, LLC RMD Submission and RMP

1. Implementing Know-Your-Customer Protocols

Consistent with the FCC’s Caller ID Authentication Best Practices No. 1 and 47 C.F.R. § 64.1200(n)(3), with respect to its VoIP services, BCI Mississippi Broadband, LLC vets the identity of potential subscribers, in conjunction with (i) approving an application for service; (ii) provisioning of network connectivity; (iii) entering into a contract agreement; or (iv) granting the right-to-use telephone number resources. In so doing, BCI Mississippi Broadband, LLC takes “affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.”

In this regard, BCI Mississippi Broadband, LLC has implemented appropriate Know-Your-Customer (“KYC”) protocols when onboarding new or renewing customers. As part of its KYC protocols, BCI Mississippi Broadband, LLC requires any customer to provide sufficient information to ensure its legitimacy.

Among other things, BCI Mississippi Broadband, LLC generally requires its customers to provide the full legal name and contact information, and, for commercial customers, state or country of incorporation and nature of the customer’s business. BCI Mississippi Broadband, LLC services are provided to fixed locations using its own broadband network and services are typically installed on location by its personnel, so it knows the actual location of its customers. This information enables BCI Mississippi Broadband, LLC to validate the identity of potential customers prior to the provisioning of service. BCI Mississippi Broadband, LLC will not provide voice service if a new customer’s identification cannot be verified.

2. Contractual Provisions to Mitigate Illegal Robocalls

Voice service customers of BCI Mississippi Broadband, LLC are subject to robust terms and conditions that (1) obligate customers not to use BCI Mississippi Broadband, LLC services for unlawful purposes; and (2) preserve BCI Mississippi Broadband, LLC’s right to terminate customers for violations of the law.

BCI Mississippi Broadband, LLC customer agreements include terms that forbid the customer from using BCI Mississippi Broadband, LLC services inconsistent with normal call patterns. BCI Mississippi Broadband, LLC customer agreements’ terms provide that if the customer’s voice service is used for an unlawful purpose, then BCI Mississippi Broadband, LLC may, at its sole discretion, suspend or terminate the customer’s service immediately, among other remedies.

3. Only Accepting Traffic from Providers in the RMD/Know Your Upstream Provider

As a reseller, BCI Mississippi Broadband, LLC necessarily relies on IDT for compliance with the FCC’s requirements related to acceptance of traffic. BCI Mississippi Broadband, LLC’s upstream provider, IDT, is registered in the FCC’s Robocall Mitigation Database and has described its “know your upstream provider” protocols in its mitigation plan, including assuring that if the company is a Voice Service Provider, Foreign Voice Service Provider, Intermediate Provider, and/or Gateway Provider, IDT confirms, in accordance with currently effective FCC rules, that the company is appropriately listed in the FCC’s RMD and has not been delisted pursuant to an enforcement action before accepting traffic from such entities.

4. Blocking Calls on a Do-Not-Originate List

IDT's robocall mitigation plan on file with the FCC reports that it blocks calls purporting to originate from a number on a reasonable Do-Not-Originate ("DNO") list that is associated with North American Numbering Plan numbers, and that it has protocols in place to detect DNO calls and blocks calls that are determined to originate from a DNO number.

5. Analyzing and Monitoring Network Traffic - Call Analytics Used to Detect and Block Unlawful Robocalls

As a reseller, BCI Mississippi Broadband, LLC necessarily relies on its wholesale provider IDT to monitor and detect patterns indicative of potential unlawful robocalls and to block such calls. IDT's robocall mitigation plan reports that it:

- has in place anti-fraud processes that enable it to, among other things, monitor network usage, identify suspicious network activity (based on call duration, abnormal call patterns, atypical call activity, and subscriber information), receive automatic alerts, investigate traffic to distinguish fraud from honest customer usage, and resolve cases intelligently on a case-by-case basis;
- uses internally developed electronic as well as manual customer analytics tools designed to monitor traffic for suspicious patterns (IDT describes that what makes a pattern "suspicious" is the result of multiple factors, which may (and likely will) vary based on numerous considerations including, but not limited to: commercial history with IDT of entity transmitting traffic to IDT Telecom; terminating location of traffic; length of calls; originating ANIs of traffic; prior understanding of IDT Telecom regarding the traffic to be transported; country/region of originating calls; as well as other factors which may or may not be considered in all instances);
- uses You Mail Protective Services and compares ANIs against a Do Not Originate list provided by Somos, Inc. through their subsidiary, XConnect, to block such traffic automatically; and
- blocks all numbers on the Industry Traceback Group Do Not Origin List and is consistently reviewing and considering the implementation of additional DNO lists.

If BCI Mississippi Broadband, LLC receives a report from IDT of suspected unlawful robocall traffic originated by its end-user customer, BCI Mississippi Broadband, LLC will investigate. To the extent a customer is found to have violated its terms of service, takes appropriate action to address such behaviors, which may include terminating the customer's service.

6. Responding to Commission, Law Enforcement and ITG Traceback Requests

BCI Mississippi Broadband, LLC will respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium ("ITG") within 24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use BCI Mississippi Broadband, LLC network to carry or process calls. BCI Mississippi Broadband, LLC is also committed to cooperating with IDT regarding any traceback requests received by IDT that are associated with BCI Mississippi Broadband, LLC end-user customers. As part of these commitments, BCI Mississippi Broadband, LLC will take the necessary steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission through its Enforcement Bureau and will comply with the requirements of such notice and do so in accordance with the applicable FCC rules.

7. Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

BCI Mississippi Broadband, LLC provides the following name, title, department, business address, telephone number, and email address of the individual within BCI Mississippi Broadband, LLC that leads BCI Mississippi Broadband, LLC's team that handles robocall mitigation-related issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Traceback for Robocalling

Toll Free: 800-457-5351
Contact Name: MaxxSouth Network Engineering
Carrier Support Email: neteng@maxxsouth.com
Phone: 833-550-1856
Website: www.maxxsouth.com

Subpoena for Robocalling

Toll Free: 800-457-5351
Contact Name: BCI Mississippi Broadband, LLC Legal Department
Email: subpoenas@maxxsouth.com
Fax: 662-236-3593
Website: www.maxxsouth.com/legal

8. Updating BCI Mississippi Broadband, LLC RMD Submission and RMP

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(c)(5) & (d)(5), BCI Mississippi Broadband, LLC will update its submission in the RMD within 10 business days of any change to the applicable information it must provide in the RMD, including its RMP.

9. Business Identifying Information

BCI Mississippi Broadband, LLC is a subsidiary of Block Communications Inc, DBA MaxxSouth Broadband. Its headquarters is located at 2700 Oregon Road, Northwood, OH 43619.

Geoffrey Shook
President, MaxxSouth Broadband

Tommy Taylor
Chief Technology Officer

Justin Hicks
Director, IP Network Operations & Video Services, MaxxSouth Broadband

Sincerely,

A handwritten signature in blue ink, appearing to read "Geoffrey Shook", is written over the printed name and title.

Geoffrey Shook
President

Exhibit A

<u>Company Name or Trade Name</u>	<u>FRN</u>
BCI MISSISSIPPI BROADBAND, LLC	0024109449