

Clarity Telecom, LLC dba Bluepeak Fiber ROBOCALL MITIGATION PLAN

Clarity Telecom is a small/rural carrier eligible for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304. As of June 30, 2023, Clarity Telecom is without a STRIR/SHAKEN obligation as its portion of the Company's network is still non-IP and relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. The infrastructure routing IP traffic is owned and operated by third party, hosted voice providers, namely Momentum Telecom, Inc. and Alianza, Inc., and they are tasked with executing the STIR/SHAKEN protocol for our network.

Clarity Telecom knows all carriers from which it receives traffic, has confirmed that all its connected carriers are listed in the Robocall Mitigation Database and are now incorporating traceback and prohibited traffic language in all contractual agreements with carriers.

Clarity Telecom has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on Clarity Telecom's network are subject to the described robocall mitigation plan.

Clarity Telecom monitors its call detail records for patterns indicative of originating robocalls. Clarity Telecom's switch also has the ability to generate reports identifying any detected suspicious call activity, patterns or other anomalies such as:

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

Clarity Telecom will examine the reports, investigate the calls and identify the source of the originating calls as unlawful or legitimate.

Enforcement

If it is determined a Clarity Telecom customer is originating prohibited unlawful robocalls on our network, Clarity Telecom will either warn the customer to stop or terminate their service as allowed per Clarity Telecom's policy.

Traceback

Clarity Telecom is committed 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. We respond within 24 hours to all traceback requests from the Federal Communication Commissions, law enforcement, and the industry traceback consortium.

Know Your Customer

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

Database Eligibility

Clarity Telecom has not been prohibited from filing in the RMD.

Third Party Providers

We have confirmed that our third party providers are compliant with and have a current Robocall Mitigation Plan filed with the RMD.

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