

Independents Fiber Network, LLC

Robocall Mitigation Plan

Revised February 26, 2024

1. Purpose of Robocall Mitigation Plan.

Independents Fiber Network, LLC ("IFN") is dedicated to stopping illegal robocalls calls from originating on its network and to cooperating with the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group.

This document describes its Robocall Mitigation Plan and "reasonable steps" that are being taken to prevent the origination of illegal robocalls prior to the full implementation of STIR/SHAKEN as required by the TRACED Act and FCC rules.

2. Roll in the Call Chain

IFN (FRN 0013194675) is a non-gateway intermediate provider without a STIR/SHAKEN obligation that serves rural ILECs, CLECs and interexchange carriers.

3. Non-Gateway Intermediate Exemption Rule.

IFN lacks control over the networks of the ILECs, CLECs and IXC's that it serves. Thus, IFN claims the Non-Gateway Intermediate Provider exemption pursuant to the Second Caller ID Authentication Report and Order, 36 FCC Rcd 1859, 1868, para. 19 (2020) ("...voice service providers which lack control over the network infrastructure necessary to implement STIR/SHAKEN are not subject to our implementation requirements.").

4. Certification of Call Origination Procedures

IFN certifies that all IP originating calls that it processes are subject to STIR/SHAKEN protocols. IFN will not accept originating calls from ILEC or CLEC voice providers that have not been attested or subject to a robocall mitigation plan that is on file in the RMD.

5. Participation in Traceback.

IFN certifies that it will respond fully, within 24 hours, to all traceback requests from the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group ("ITG") and will fully cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls. A single point of contact has been established to respond to any requests.

Name
Title
Street address
City-State address
Phone

Email

IFN follows the *ITG Policies and Procedures* document, including the *Provider Traceback Best Practices* contained in Appendix A. (This document is available at: <https://tracebacks.org/itg-policies-and-procedures/>).

6. Eligibility to Participate in the Robocall Mitigation Database.

IFN certifies that it has not been barred or prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action. It further certifies that the company has not at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

7. Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls: Subscriber Vetting (Know Your Customer, Customer Identification and Due Diligence).

IFN utilizes the three key components of Know Your Customer (“KYC”) plans required in the financial services industry: Customer Identification, Customer Due Diligence, and Ongoing Monitoring. One benefit of being a small company is that IFN employees know all their telecommunications industry customers. In addition, the company utilizes *Best Practices for the Implementation of Call Authentication Frameworks* published by the NANC Call Authentication Trust Anchor Working Group. (This document is available at: <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf> and FCC Public Notice DA 20-1526, released December 22, 2020).

Vetting of its ILEC, CLEC and IXC carrier customers involves obtaining information such as:

- Legal business name and trade names
- Federal tax ID
- State of Incorporation (only for foreign corporations)
- Nature of the business
- Primary contact person
- Service addresses
- Operating Company Numbers OCN(s)
- Carrier Identification Codes (CICs)
- FCC Form 499-A filing status

- Robocall Mitigation Plan content and filing status

8. Third-Party Validation and Real-Time Network Monitoring (KYC – Monitoring).

IFN utilizes the ClearIP monitoring system from TransNexus that captures call details and provides call analytics, responses, and reports in real-time to process calls. During call setup the originating ANI is checked against several databases to determine if the number is invalid, on a DNO list (Do Not Originate), known robocall number list, etc.

The use of call analytics, alerts and reports allows IFN to immediately contact its carrier customer to discuss unusual calling, determine if illegal robocalls are involved and provide necessary warnings or terminate the service. The system also produces real-time reports that provide details of all outbound network calling, including date, time, ANI, call volume, duration and other details that will assist in identifying calling patterns and detecting deviations from normal patterns.

9. Know Your Upstream Providers.

IFN is a small provider, and the number of its upstream providers is limited. IFN has longstanding relationships with its upstream providers and maintains an awareness of their nature of business and the legitimacy of their call transmission services. The Robocall Mitigation Database is monitored to ensure that all upstream providers have current mitigation plans and that none have been suspended or revoked by the FCC. Upstream provider Mitigation Plans are reviewed for the details of their actions to mitigate illegal robocalls. Future contractual agreements with upstream providers will include provisions designed to mitigate illegal robocalls. IFN will not accept direct traffic from any voice service provider or gateway provider that is not listed in the Robocall Mitigation Database.

10. Accepting Calls from Non-Gateway Intermediate Providers.

Pursuant to the *Sixth Caller ID Authentication Report and Order*, IFN will not accept any traffic directly from a non-gateway intermediate provider not listed in the Robocall Mitigation Database, effective May 28, 2024.

11. International Services.

Com Net, Inc. ("CNI"), parent company of IFN, holds international section 214 authorization for resale international long distance. This service is available to IFN's domestic ILEC and CLEC customers if they select Bright Long Distance, a registered trade name of IFN. IFN does not sell any services to international call originators using NANP number resources.

12. Mitigation Plan Revisions.

IFN is committed to update this plan as conditions change and the availability of additional robocall mitigation systems, particularly for TDM traffic, gain industry-wide acceptance. The Robocall Mitigation Database will be updated within ten (10) business days of any substantial changes to the current plan.