

Robocall Mitigation Plan

Company Name: GCR Telecommunications, Inc. **499 Filer ID:** 826044

Company Address PO Box 511 / 1104 Seymour Drive

South Boston, VA 24592

Company Contact: Glenn C. Ratliff, Jr. **Contact Title:** General Manager

Contact Phone: 434-570-1103

Contact E-mail: gcr@gcrcompany.com

Type of Voice Customers: ☐ Residential ☒ Enterprise Business ☐ Wholesale

Voice Service Provided Via ☐ Own NXXs ☒ Leased DIDs

STIR/SHAKEN Certificate: ☒ Use own ☐ Use 3rd party provider's

Routing ☐ Via direct network connections
☐ Via 3rd party network connections
☒ Via DID provider's network connections

Before Service is Established for a New Customer

Customer Vetting Description	
Residential	N/A (we do not provide residential services)
Enterprise Business	GCR Telecommunications, Inc. verifies new business customers via tax identification number and address verification to ensure that they are a valid US business. We do not provide services to businesses outside of the United States.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

Provisions regarding Traceback in Contracts

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Residential	N/A (we do not provide residential services)
Enterprise Business	GCR Telecommunications, Inc. requires customer assistance in all traceback requests, and they are required to participate in any and all traceback investigations involving the GCR Telecommunications, Inc. voice network.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

Participation in FCCs Enforcement Database	
FRNs associated with 499 Filer ID	0008368326

During Service

Plan for end users to have access to caller ID and blocking systems	
Residential	N/A (we do not provide residential services)
Enterprise Business	Enterprise Business customers do not have access to change originating Caller ID. GCR Telecommunications, Inc. blocks unallocated DIDs originating from our network. Additionally, GCR has an allow list of numbers for each customer and requires our customers to send a certain CPN. If the customer tries to send a different number, then GCR rewrites the CPN with a default one for that customer. This ensures that unallocated DIDs are not originated from our network.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

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Monitoring Plan	
Residential	N/A (we do not provide residential services)
Enterprise Business	GCR Telecommunications, Inc. is utilizing monitoring and fraud detection services as a wholesaler through bandwidth.com (DBA Bandwidth.com CLEC, LLC). Alerts through the service are provided to GCR Telecommunications, Inc.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

Plan for Investigating Suspicious Activity	
Residential	N/A (we do not provide residential services)
Enterprise Business	After alerts have been generated, GCR Telecommunications, Inc. engineers shall review CDRs and SIP logs to ascertain the source, times and any other pertinent information in regard to suspicious calling activity made across the GCR Telecommunications, Inc. network. Logs shall be preserved as long as deemed necessary and in accordance with any state or federal law or law enforcement investigations.
Wholesale (another company reselling your services)	N/A (we do not provide wholesale services)

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After Service Has Been Used for Illegal Robocalling

Traceback Investigations	
Own traceback methods	Telephone numbers flagged as being used for illegal robocalls will be reported to the FCC and FTC. GCR Telecommunications, Inc. is currently blocking the origination of all unallocated and unused telephone numbers.
Traceback methods for dealing with law enforcement, the FCC, and/or ITG (Industry Traceback Group)	GCR Telecommunications, Inc. will block originating traffic identified as illegal robocalls and may terminate service entirely. Telephone numbers flagged as being used for illegal robocalls will be reported to the FCC and FTC. GCR Telecommunications, Inc. is currently blocking the origination of all unallocated and unused telephone numbers.
Single Point of Contact for Tracebacks	Glenn C. Ratliff, Jr., General Manager Office 434-570-1103 Cell 434-579-1537 PO Box 511 / 1104 Seymour Drive South Boston, VA 24592

Communications with State Attorneys General	
Single Point of Contact	Glenn C. Ratliff, Jr., General Manager Office 434-570-1103 Cell 434-579-1537 PO Box 511 / 1104 Seymour Drive South Boston, VA 24592