

Bijou Telephone Cooperative (Bijou or the Company) (FRN 0003754652) has implemented a Robocall Mitigation Program, required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. §64.6305, as documented herein. Bijou is a rural local exchange carrier operating in the state of Colorado and has received the extension pursuant to §64.6304(d) for non-IP networks.

Bijou's Robocall Mitigation Program includes, but is not limited to, the following:

1. Bijou maintains a rigorous "know your customer" process, specifically designed to prevent new and renewing customers from using Bijou's network to originate illegal calls. Bijou investigates new and renewing customers seeking access to high-volume origination services and, if necessary and possible, modifies service terms and conditions to mitigate the potential of any new or renewing customer originating illegal robocalls.
2. Bijou has implemented a "know your upstream provider" process that includes exercising due diligence prior to accepting traffic from such providers. This process includes, but is not limited to, collecting information from upstream providers such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the upstream provider's business. If and when necessary, Bijou will take additional steps, such as adopting contract terms and conditions that allow termination of the traffic exchange in the event the upstream provider attempts to use Bijou's network to carry or process a high volume of illegal traffic.
3. Bijou has processes in place to ensure it responds fully to any traceback request from the FCC, civil or criminal law enforcement agents, and the industry traceback consortium in a timely manner. Bijou has designated a traceback response contact(s) who are aware of the traceback requirements contained in 47 C.F.R. §64.1200(n)(1) and the obligations contained in 47 C.F.R. §64.1200(n)(2) in the event the Company receives notification of a traceback request.
 - a. Upon receipt of any traceback request, Bijou will take steps to promptly investigate the traffic, and if a notice is received as outlined in FCC rules, will also take steps to effectively mitigate the illegal traffic.
 - b. If Bijou determines that the identified traffic is not illegal, it will provide an explanation in the report it submits to authorities as to how Bijou reached this conclusion.
 - c. If Bijou determines that the identified traffic came from another voice provider with direct access to the United States public switched telephone network, the report will identify that voice service provider and the notified voice service provider should take mitigation steps if possible, or
 - d. If Bijou does not reach either of these conclusions (b or c above), its report will include the steps take to effectively mitigate this traffic.
4. Bijou analyzes high-volume voice traffic to identify and monitor patterns consistent with robocall campaigns.
5. Bijou analyzes traffic for patterns indicative of fraudulent calls – e.g., identify short duration calls with low completion rates.
6. If Bijou detects a pattern consistent with illegal robocalls, or otherwise has reason to suspect illegal robocalling or illegal spoofing is taking place over its network, the Company will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action.

- Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating or suspending the party's ability to originate, route, or terminate calls on its network, or notifying law enforcement authorities.
7. Bijou Telephone Cooperative's network only uses non-IP technology that cannot initiate, maintain, and terminate SIP calls, making it incompatible with STIR/SHAKEN. Thus, Bijou is unable to implement STIR/SHAKEN in any part of its network at this time and must continue to avail itself of the non-IP networks extension under §64.6304(d) of the FCC's rules. Bijou will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network when such a protocol has been fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.
 8. While technically owned by members of the cooperative, the principal that exercises management control of Bijou Telephone Cooperative is Brian Creveling. Bijou Telephone Cooperative is the parent company and has the 100% owned subsidiaries Eastern Colorado Independent Networks LLC (ECIN) and Bijou Leasing, LLC. Bijou Leasing provides no voice or telecommunications services. ECIN follows all of the above procedures and has made their own filing on this matter.
 9. Bijou does not use any third-party analytics vendors to avoid illegal robocall traffic.