

Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions

ROBOCALL MITIGATION PLAN

Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions, Operating Company Number 0348, and Bulloch Cellular, Inc. OCN 079G (Bulloch) is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions's non-IP network is connected to a carrier that do not support IP connectivity; therefore, Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions cannot upgrade the Non-IP connections to IP connectivity.

Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions's network also has IP-portions which originates calls via SIP connections to other carriers. Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Bulloch County Rural Telephone Cooperative, Inc. dba Bulloch Solutions has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network. The Company uses Ribbon for both the STI Secure Telephone Identity – Authentication Service and the Secure Telephone Identity – Verification Service functionality. The Company has its own STIR/SHAKEN certificate which is issued by Neustar.

Call Analytics

Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions has contracted with Ribbon to provide robocall analytics and reputation scoring of our network's outbound and inbound traffic. The vendor uses software to monitor voice traffic in real time and provides detailed reporting identifying if our network originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions has access to the vendor's portal and Bulloch will review the downloadable reports weekly regarding telephone numbers originating suspected illegal robocalls on its network. The software's identification of suspected illegal robocalls and alerts helps prevent the origination of illegal robocalls.

Investigation

Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions investigates calls identified by Ribbon as suspicious calls or those that have abnormal call volumes, patterns or activity consistent with illegal robocalls.

In addition, if Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing is prohibited on our network. If it is determined a Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions customer is using our network to fraudulently spoof calls or to originate illegal robocalls, Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions will either warn the customer to stop such practices or terminate their service as allowed per Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions's service policy.

Know your Customer

Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions 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.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup.

Upstream Provider Knowledge

Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. No provider is using Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions's network to carry or process a high volume of illegal traffic. Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity. The connected carriers are made aware of any suspicious or illegal traffic and notified that, if the traffic does not cease, the calls may be blocked from entering Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions's network. In addition, Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions commits 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. Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling.

Bulloch County Rural Telephone Cooperative, Inc dba Bulloch Solutions has not been prohibited from filing in the Robocall Mitigation Database.

Principals, Affiliates, Subsidiaries and Parent Companies:

	Relationship to Filing Entity	Type of Company	% Owned by Filing Entity	Management or Control of the Entity
Company Name				
Bulloch Cellular, Inc	Subsidiary	C-Corp; CLEC	100%	John Scott - CEO
Bulloch Net, Inc.	Subsidiary	C-Corporation	100%	John Scott - CEO
Bulloch County Rural Telephone Cooperative Inc	Parent	C-Corp; ILEC	0%-This is the filing entity	John Scott-CEO