

Amended Robocall Mitigation Plan of BT Americas Inc.

BT Americas Inc. (“BTA”) hereby submits an amended Robocall Mitigation Plan to comply with the Commission’s Eighth Report and Order updating the STIR/SHAKEN implementation rules.¹

BTA certifies that it is exempt from STIR/SHAKEN obligations because it lacks “control over the network infrastructure necessary to implement STIR/SHAKEN.”² BTA’s calls are subject to a robocall mitigation program as described below.

BTA may modify, add, delete or otherwise alter any of the policies and procedures described in this plan at any time it deems appropriate for its business and to further the goals underlying the Commission’s rules.

Company Background

BTA is a wholly owned indirect subsidiary of BT Group plc, a UK-headquartered communications company that traces its roots to the Electric Telegraph Company incorporated in 1846. BTA operates as a private carrier in the United States, serving U.S. communications needs of multinational corporations whose names are often found on the Global Fortune 2000 list. BT Group plc and its subsidiaries are collectively referred to herein as BT.

STIR/SHAKEN Implementation

BTA contracts with a partner carrier to provide VoIP service to BTA’s customers. The partner carrier originates and authenticates all IP-based calls that BTA delivers into the U.S. The partner carrier uses its own numbers for the calls and signs the calls using its SPC token. BTA does not have access to the partner carrier’s network infrastructure except to hand over calls placed on the premises or infrastructure of BTA’s large corporate customers to the partner carrier. Without additional investment and development, BTA does not have control over the voice network infrastructure in the U.S. necessary to implement STIR/SHAKEN. Accordingly, BTA is exempt from STIR/SHAKEN obligations.³

The Commission has explicitly excluded from the definition of “third-party authentication” instances where a provider with a STIR/SHAKEN obligation “simply has a customer that is not the end user that initiated the call.”⁴ BTA’s carrier partner is a voice service provider with a STIR/SHAKEN obligation. BTA is the carrier partner’s customer, and BTA’s customers are the

¹ See *Call Authentication Trust Anchor*, Eighth Report and Order, 39 FCC Rcd 12894 (2024).

² See *id.* ¶ 8 (“Providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN, such as switches for voice service in the IP portion of their network, are exempt from STIR/SHAKEN implementation requirements.”) (citing *Call Authentication Trust Anchor; Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, ¶ 40 (2020) (“Finally, we clarify that the rules we adopt today do not apply to providers that lack the network infrastructure necessary to implement STIR/SHAKEN.”)).

³ *Id.*

⁴ *Id.*

end users initiating calls. As explained above, BTA's customers place calls in the U.S. using phone numbers provided by BTA's carrier partner. The carrier partner then originates and signs the calls. Without significant investment and development, BTA lacks sufficient control over the network infrastructure to originate or sign its own customers' calls.

Aside from interfacing with its customers, BTA provides information necessary for its partner carrier to properly sign calls. BTA assigns calls that should receive an A, B or C attestation level to trunks A, B or C, respectively. These trunks are connected to BTA's partner carrier, which then uses this information to sign the calls using its SPC token. BTA will work with its carrier partner to mitigate any unlawful traffic that may arise.

IP-based calls terminating in the U.S. are handed over to the partner carrier over trunks A, B or C, respectively, and the partner carrier then handles the calls in compliance with U.S. STIR/SHAKEN rules. There is also a percentage of IP-based calls brought into the U.S. over BT's private global backbone and handed over leased private circuits directly to BTA's customers per contracts with said customers. These calls do not reach the U.S. public switched telephone network ("PTSN").

There may be a portion of calls that BTA passes into the PTSN that would not be IP-based. For these calls, BTA is a member of INCOMPAS, a trade association that is actively working to develop a caller ID authentication solution that is operational on non-IP networks. In addition, as described below and in accordance with the Commission's rules, BTA has implemented a Robocall Mitigation Plan for all its calls originating and/or terminating in the U.S.

Robocall Mitigation Plan

Customer Due Diligence – BTA or its affiliates providing services to global enterprises conducts due diligence on each global enterprise before deciding whether to pursue a business relationship. As an initial matter, this includes evaluating via one or more global risk, monitoring and screening tools any adverse news reports about the target enterprise, gathering intelligence on the target enterprise to understand the target company's business and operations sufficiently so as to be able to propose multi-country communications solutions for the target, running credit checks, and meeting internal gating requirements that involve peer review regarding the proposed relationship with the enterprise.

Customer Contract – When BTA (or its affiliates) signs a contract with a global enterprise, its contracts will contain provisions requiring compliance with applicable laws and regulations and often will contain customer-specific acceptable use policies. BTA and its affiliates have declined to pursue contracts that would not be compliant with applicable laws or that pose excessive reputational risk.⁵

Anti-Fraud Measures – BTA, as part of a larger global BT family, guards against fraud by using a number of system alarms that monitor service across its platforms and that have triggers to alert the relevant departments when anomalies occur. Depending on the occurrence, BTA relies on its

⁵ If on a rare occasion BTA works with an upstream provider, it would follow due diligence and contractual procedures similar to those described in this mitigation plan.

parent's rigorous triage platform which will investigate, notify, and block calls based on the triggering events.

Methods Used to Prevent Illegal Traffic – With respect to measures used to avoid the origination of unlawful calls, BTA and the larger BT family have processes intended to capture relevant information about its customers, their businesses, and their service needs. As part of the service provisioning processes performed by BTA in onboarding its customers, the business profile of the customer is defined in BTA's systems. This typically includes telephone numbers that the customer is authorized to use and information regarding where calls for that customer are expected to originate.

In general, BTA does not support auto-dialers or predictive dialers as standard. Where there is a customer request to support, the conditions under which auto-dialers may be used include:

- The customer's confirmation of compliance with all applicable laws, rules, regulations, and Codes of Practice;
- Limitations on calls per second;
- The express right of BTA, through its carrier partner, to throttle or block auto-dialer traffic if appropriate; and
- The express right of BTA to disconnect the service in the event of misuse.

Cooperating with Traceback Requests and with State and Federal Regulators

BTA is committed to responding within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls, in accordance with applicable laws. BTA has established robust processes for such requests as follows:

- Point of Contact – BTA has a dedicated team standing ready to address traceback requests and with this registration, is providing a name, title, department, business address, telephone number, and email address to reach the individual within the company responsible for addressing robocall mitigation-related issues.⁶
- Ongoing Coordination – BTA will act in accordance with applicable laws in cooperating with Industry Traceback Group requests regarding instances of suspicious traffic.
- Timely Investigation and Response – upon receiving a traceback request, BTA will act expeditiously in investigating and responding to the best of its ability and in accordance with applicable law.
- Privacy of Traceback Investigations – BTA will not share information about traceback investigations, except as permitted by applicable law.

⁶ See *For Providers*, Industry Traceback Group (last visited Sept. 3, 2025), <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/> (“Providers do not need to proactively register with the ITG to cooperate with traceback requests and thus meet their legal obligation.”).

- Cooperation with the Commission, law enforcement and the industry traceback consortium
 - BTA will cooperate with lawful requests issued by these entities to investigate and stop illegal robocallers that use BTA's service to originate calls.

BTA will remain vigilant to maintain the trustworthy status of its traffic. BTA will comply with applicable laws in responding to lawful requests for assistance in addressing illegal calls.