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Your Full-Service
Internet
Communications
Company

Company Name: Mercury Network Corporation

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Pursuant to 47 C.F.R. § 64.6305, Mercury Network submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Mercury Network has in place to mitigate illegal robocalls as of March 31, 2024. Mercury Network may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

As of March 31, 2024, Mercury Network has a mix of TDM and SIP traffic on its network. The current status of its STIR/SHAKEN implementation is:

- ☒ My traffic is fully attested. (SIP, not TDM)
- ☐ My traffic is partially attested.
- ☐ None of my traffic is attested yet

Mercury Network has fewer than 100,000 end users, all of who's phones and equipment were professionally installed by Mercury employees. We know our customers personally. Customers cannot forge Caller IDs, none are in a robocall business, and we've never had a robocall incident. That said, Mercury Network monitors the network for robocall incidents, but to date that monitoring has only detected a handful of technical false positives. Mercury Network has implemented STIR/SHAKEN on all outbound SIP calls. STIR/SHAKEN has not been implemented on outbound TDM calls since a standard for doing so has not yet been implemented. That said, the vast majority of our traffic is SIP and fully attested. Mercury Network has implemented the following robocall mitigation plan to address unlawful robocall traffic:

Mercury Network has enforceable terms of use and/or an acceptable use policy noted in its contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company confirms the following information for its customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls
- Service Address
- When the customer is a business, Business Incorporation Documents

Mercury Network has established methods and procedures to monitor its network and detect and prevent fraudulent activity. The company uses call authentication and call blocking services to protect its networks and customers from harmful calls. It also uses software to monitor its network's use and has established methods and procedures in place to address issues as soon as they are identified.

Mercury Network complies fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Mercury Network has designated an individual as a dedicated point of contact for addressing traceback requests. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>. Mercury Network will respond promptly to inquiries from the Industry Traceback Group (ITG).

If a pattern of questionable activity is detected Mercury Network will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated. Requests from the ITG must be submitted in writing and include the following information:

1. Company Name:
2. Company Address:
3. Requestor's Name:
4. Requestor's Title:
5. Requestor's Phone number:
6. Requestor's E-mail:

Mercury Network will cooperate with state and federal regulators to prevent any and all illegal robocalls. Requests from the valid agency must be submitted in writing and include the following information:

1. Law Enforcement Agency Name:
2. Agency Address:
3. Requestor's Name:
4. Requestor's Title:
5. Requestor's Phone Number:
6. Requestor's E-mail:

Mercury Network will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.