



First Step Internet, LLC
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ROBOCALL MITIGATION PLAN

First Step Internet (“FSI”) is a broadband internet service provider that services parts of northern Idaho and eastern Washington. We have been supplying our local region with internet connectivity since the early 1990s. In addition to broadband connectivity, we have also been providing IP-based voice services to our broadband subscribers since 2012.

As of 30 June 2022, FSI has finished completely implementing STIR/SHAKEN call authentication natively on our voice platform; the year prior, we had claimed the “small voice service provider” extension as outlined in Title 47 CFR section 64.6304 (a), and then finished our implementation the following year pursuant to the advanced deadline.

FSI currently has no direct interconnection to the PSTN, nor do we have NANP numbering resources of our own, and we rely on “intermediate providers” to both supply us with numbers as well as to carry our voice traffic to the PSTN for us. We also only directly service end-users, and are not a wholesaler of voice service nor do we provide intermediate call path or gatewaying services to any entities. All intermediate providers that we terminate calls through are also listed in the Robocall Mitigation Database.

FSI has also long had effective Caller-ID anti-spoofing measures in place, even before the advent of STIR/SHAKEN. The phone numbers used by a subscriber on our network are either first obtained by us from one of our intermediate providers, or are ported over to one of our intermediate providers. Each number is exclusively assigned to a specific subscriber account within our customer provisioning database, and when one of our subscribers makes an outbound call, our voice platform checks that the number being transmitted by the calling party is one of their own. If the number being transmitted by that subscriber is known to belong to that subscriber, it will be passed through without modification. If, however, the number in question does *not* belong to that subscriber, the system will not block the call from going through, but will transmit the primary billing telephone number (BTN) from their account as the Caller-ID value in place of whatever number they supplied for that call.

In short, FSI does not allow and has never allowed any of our subscribers to send a Caller-ID number that does not match a number clearly belonging to their account. If they transmit a number that isn't actually provisioned on their account, it will be forcibly overwritten with an actual valid number of theirs instead. We simply won't allow a Caller-ID spoof. This has been the case since our voice service launched.

If a potential subscriber desired to use the FSI voice product solely for call termination, and wanted to be able to transmit numbers that they already owned as the Caller-ID without porting the numbers to us, we can upon request whitelist those numbers for their

account within our system. But we would only do so after they had first supplied us with sufficient documentation for proof-of-ownership of those numbers, and the standard for such proof-of-ownership would need to match or exceed that required for us to do an actual number port (*e.g.*, CSRs from their other provider(s) clearly detailing said numbers, a signed Letter of Authority from a company officer, *etc.*). To-date, though, we have yet to have a subscriber approach us to request whitelisting of their other phone numbers on our network.

The risk of robocalls originating from our network are extremely low, not only given our stance on Caller-ID spoofing and the measures we've taken against it, but also given the nature of our product and clientele. FSI does not sell IP-based voice service to just anyone within the U.S., and we only actively market our voice service to prospective and existing broadband internet customers of ours within the restricted geographical service area where we provide broadband coverage. We prefer to have our own voice service run exclusively atop our broadband network so that we can ensure the best quality of service. Though we have on extremely rare occasions allowed a voice subscriber to make use of our voice product over a non-FSI broadband connection, such users have to make special arrangements with us ahead of time since our IP voice service is firewalled off from the internet at large. So local residential users and local businesses constitute 100% of our voice customers, we get to know our prospective customers before setting up their service, and we have never had a large call center as a client.

If FSI were ever to learn that a subscriber of ours was using our network to make illegal robocalls, that would be a violation of our terms of service and would be grounds for immediate termination of service. FSI also commits to respond to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with said entities in investigating and stopping any robocallers from using our services to originate their illegal calls.

Respectfully yours,

A handwritten signature in black ink that reads "Nathan Anderson". The signature is fluid and cursive, with the first name "Nathan" and last name "Anderson" clearly distinguishable.

Nathan Anderson

Network Engineering

First Step Internet, LLC