

Mound Bayou Telephone & Communications, Inc.
Robocall Mitigation Plan

STIR SHAKEN Extension Eligibility Rules

Mound Bayou Telephone & Communications, Inc. (MBTC) is a family owned, U.S. based small/rural carrier with fewer than 100,000 voice subscriber lines. MBTC relies upon traditional, non-IP networks for all of its connections to other carriers who do not support IP connectivity at this time, making it eligible for the continuing extension granted under 47 CFR § 64.6304(d).

MBTC's phone switch only originates or receives calls to or from the public telephone network via traditional TDM-type trunks and does not originate or receive SIP calls to or from the public telephone network. Therefore, MBTC is not currently implementing SHAKEN/STIR, as the SHAKEN/STIR model currently does not apply to TDM call traffic. MBTC takes part in industry efforts to develop a TDM solution for this through membership in the National Exchange Carrier Association, which is a member of the ATIS Non-IP Call Authentication Task Force.

MBTC has implemented the following robocall mitigation program to detect and prevent unlawful robocalls from originating on its network. All calls that originate on MBTC's network are subject to the described robocall mitigation program.

Robocall Mitigation Plan

MBTC is committed to halting any illegal robocall activity originating on its network. Illegal robocalling activities are prohibited in the company's service terms, and the company will efficiently investigate and act on reported robocalling activity.

MBTC's switch is prevented from originating numbers that are not valid North American Numbering Plan (NANP) numbers, known numbers not allocated to a provider and numbers not assigned to a MBTC subscriber, as the switch is configured to only originate calls from NPA-NXX's which have been assigned to the switch. Those assigned NPA-NXX's are within the MBTC's Rate Centers and are either NPA-NXX's assigned to MBTC or are NPA-NXX's containing telephone numbers ported to MBTC. Numbers not assigned to a customer or used for internal testing are suspended and cannot originate calls through the switch. MBTC has confirmed that their toll traffic provider, Toly Digital Network, blocks 'do not originate' numbers, will cooperate on tracebacks, and that they block any calls from providers the FCC has indicated for such measures. MBTC also routinely confirms their toll traffic provider has a Robocall Mitigation Plan currently on file.

-Investigation

Suspect calls and customer complaints are investigated promptly. Investigations may include, but are not limited to call history, call records, and direct inquiry, depending upon the particular circumstances of a suspected incident. Investigation will be initiated within one business day for any customer complaints regarding suspected robocall activity.

-Analytics

MBTC does not utilize an automated call analytics system, third party or otherwise. The company's billing department regularly reviews usage patterns and initiates investigation upon discovery of unusual usage.

-Enforcement

Any MBTC customer that is suspected of robocalling will have their voice services suspended immediately pending investigation. If it is determined a MBTC customer is originating prohibited unlawful robocalls on our network, MBTC will either warn the customer to cease prohibited activities or terminate their service as allowed per MBTC policy. Discovery of customer-originated fraudulent robocall activity will result in reporting of such activity to the appropriate authorities, dependent upon circumstance (for example, public service commission, FCC, etc).

-Know Your Customer

MBTC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. MBTC 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.

-Upstream Provider Knowledge

MBTC knows all the carriers from which it receives traffic, has confirmed that all its connected carriers are listed in the Robocall Mitigation Database, has reviewed the connected carriers' Robocall Mitigation Programs to learn how those carriers monitor their originating traffic and mitigate illegal robocalls. MBTC maintains open communications channels with its upstream providers to ensure an efficient means of reporting and mitigating irregular activity, including, but not limited to, fraudulent robocalling activity. MBTC incorporates traceback and prohibited traffic language in all new contractual agreements with carriers. MBTC does not directly receive traffic from any foreign originating or intermediate provider. No provider is using MBTC's network to carry or process a high volume of illegal traffic.

-Role In Call Chain

MBTC's role in the call chain is as a non-IP originating voice service provider without a STIR/SHAKEN obligation per the continuing extension granted under 47 CFR § 64.6304(d). Since MBTC does not have any IP-based telephone trunks with other carriers, SHAKEN/STIR has not been implemented due to its lack of applicability to non-IP traffic. MBTC's phone switch equipment does not originate any IP telephone traffic to the public phone network.

Traceback

MBTC is committed 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.

MBTC is committed to complying with the FCC's TRACED Act (FCC-20-42A1) and related legally specified traceback requirements, and requires all customers and users of MBTC's Voice Service to comply with these laws. Accordingly, as stated in its Terms Of Service,

customers may not use MBTC equipment, network, facilities, or voice or broadband service in any way to engage in or otherwise permit illegal robocalling or spoofing activities.

Robocall Mitigation Database Eligibility

To our knowledge, MBTC, OCN 0462, has NOT been barred from the RMD due to any law enforcement or Commission action as of the time of posting of this document, and is NOT subject to any formal Commission, law enforcement, or other regulatory agency action or investigation due to suspected unlawful robocalling.