

## **Robocall Mitigation Program**

### **Advanced Tel, L.L.C.**

Advanced Tel, L.L.C. (“Advanced Tel”), doing business as REV, is located at 913 South Burnside Avenue, Gonzales, Louisiana, 70737. Advanced Tel has the following OCN number: 8839.

Advanced Tel’s role in the call chain is as a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

#### **Stir Shaken Extensions**

Advanced Tel has received the following type of extension of the STIR/SHAKEN implementation deadline under §64.6304 of the FCC’s rules: Advanced Tel qualifies for a non-IP networks extension under §64.6304(d) of the FCC’s rules, which provides the company with a continuing extension of the STIR/SHAKEN implementation deadline for those portions of its network that cannot initiate, maintain, and terminate SIP calls.

Consistent with § 64.6303 (a)(1), Advanced Tel is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. Advanced Tel’s non-IP network is connected to carriers that do not support IP connectivity, therefore, Advanced Tel cannot upgrade its Non-IP network to IP.

Consistent with § 64.6303(a)(2), Advanced Tel is a member of NTCA-The Rural Broadband Association, a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution, or actively testing such a solution.

Advanced Tel has not been prohibited from filing a certification in the Robocall Mitigation Database and has not been the subject of an FCC, law enforcement, or regulatory agency action or investigation related to illegal robocalling or spoofing or a deficient Robocall Mitigation Database filing.

Advanced Tel submits the enclosed information regarding their principals, affiliates, subsidiaries, and parent companies, none of whom have been prohibited from filing in the Robocall Mitigation Database.

RTC Holdings, L.L.C. is a parent company for Reserve Communications and Computer, L.L.C. (formerly Reserve Communications and Computer Corporation). Reserve Communications and Computer, L.L.C. is a parent company for EATELCORP, L.L.C. and voice providers Reserve Telephone Company, L.L.C. (formerly Reserve Telephone Company, Inc.) and Reserve Long Distance Company, L.L.C. (formerly Reserve Long Distance Company, Inc.). These companies previously did business as RTC and now do business as REV. EATELCORP, L.L.C. is a parent company for several companies, including voice providers Lafourche Telephone Company, L.L.C.; SJI, L.L.C.; TLX Communications, Inc.; Advanced Tel, L.L.C.; and East Ascension Telephone Company, L.L.C. These companies previously did business as EATEL or Vision Communications and now do business as REV.

Josh Descant serves as CEO of Advanced Tel, L.L.C. Reserve Communications and Computer, L.L.C. has managing control of Advanced Tel, L.L.C. and all its affiliates and subsidiaries. Advanced Tel, L.L.C. is a wholly-owned subsidiary of EATELCORP, L.L.C. Voice providers Reserve Telephone Company, L.L.C. (formerly Reserve Telephone Company, Inc.); Reserve Long Distance Company, L.L.C. (formerly Reserve Long Distance Company, Inc.); TLX Communications, Inc.; SJI, L.L.C.; Lafourche Telephone Company, L.L.C.; and East Ascension Telephone Company, L.L.C. are affiliates of Advanced Tel, L.L.C. Advanced Tel, L.L.C. has 100% ownership of affiliates of TLX Communications, Inc. Advanced Tel, L.L.C. is owned by RTC Holdings, L.L.C. The parent company of Advanced Tel, L.L.C. is Reserve Communications and Computer, L.L.C.

This Robocall Mitigation Program includes detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls. Advanced Tel does not knowingly or through negligence serve as the originator for illegal robocall campaigns. Advanced Tel is taking the steps outlined below to prevent the origination or transit of illegal robocalls on our network.

### **Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic**

The following details the robocall mitigation practices currently in place at Advanced Tel.

#### **PREVENTION OF ORIGINATION OF ILLEGAL CALLS**

As a voice service provider, Advanced Tel takes affirmative, effective measures to prevent new and renewing customers from originating illegal calls. These steps include employing call analytics, monitoring call originating volume, investigating customers expected to have high volume traffic, and including and enforcing terms in contracts disallowing illegal robocalls.

##### Call Analytics

Advanced Tel has integrated call analytics into our network to monitor voice traffic for patterns consistent with illegal robocall campaigns and fraudulent calls. Advanced Tel has entered a contract for TNS Call Guardian services. TNS Call Guardian is an industry leading call analytics solution that uses cross-carrier real-time call events combined with crowdsourced data to create accurate and comprehensive reputation profiles differentiating legitimate users of telecommunications services from abusive, fraudulent, and unlawful users. The service provides access to a dynamic data set of negatively scored telephone numbers within the Call Guardian data Analytics Engine.

##### Call Origination Volume Monitoring and Follow-Up Steps

Advanced Tel's network has IP-portions which originate calls via SIP connections to other carriers. Advanced Tel has registered with the Policy Administrator (via its affiliated company, Advanced Tel, L.L.C) and is an authorized service provider in the STIR SHAKEN ecosystem. Advanced Tel has implemented STIR SHAKEN with the IP portions of its network and signs the calls originating on the IP portions of its network with its certificate.

TNS Call Guardian services determines call treatment within the Call Guardian Authentication Hub. Based on the resulting score of the call, various options are available – whether to block, redirect, or provide a warning to the subscriber.

Clear IP is another service Advanced Tel uses that detects the number of calls from a specific number to other long distance numbers. If more than fifteen long distance calls per number originate in a fifteen-minute period, Advanced Tel automatically blocks and investigates the calls.

If Advanced Tel observes that a customer is originating an unusually high number of calls per day on average on a single line, it is our policy to determine the reason for the call volume. If there is not a reasonable explanation for the call volume, Advanced Tel can block the subscriber. Customers engaging in originating illegal robocalls are subject to termination.

#### “Know-Your-Customer” Policy

Advanced Tel investigates potential business and residential customers seeking access to high-volume origination services to ensure that the expected traffic will not be illegal or consist of illegal robocalls. Customers have to identify themselves with pin numbers, security questions, or picture identification in order to create accounts or access their account information.

#### Contracts Allow for Termination

All business customers sign contracts that specify that customers “will comply at all times with all applicable laws and regulations and the...policies as updated by Provider from time to time.” In addition, clients must “use all services provided pursuant to this entire agreement in a lawful manner and shall comply with all federal, state and local statutes, regulations, and orders.” All contracts contain a provision for termination in case of illegal use of services.

To combat robocalls, residential customers are subject to our Terms and Conditions, which specify, “[y]ou may use the Service for any lawful purpose. Any unlawful use of the Service is strictly prohibited and may be grounds for immediate termination of Service by REV.” Advanced Tel further includes the following in its residential voice Terms and Conditions, “if REV determines its services are being used to support illegal robocalling activity, or if Client fails to cooperate in addressing robocalling activity, REV may immediately and at its sole discretion block outgoing calls and/or terminate service for failure to comply with all applicable laws and regulations.”

To combat robocalls, Advanced Tel added the following to its Terms and Conditions for all business contracts: if...[Advanced Tel] determines its services are being used to support illegal robocalling activity, or if Client fails to cooperate in addressing robocalling activity,...[Advanced Tel]...may immediately and at its sole discretion block outgoing calls and/or terminate the Master Services Agreement for failure to comply with all applicable laws and regulations.”

It is Advanced Tel’s policy to immediately block suspected robocalls while investigating to ensure they are illegal. If the calls are determined to be illegal, Advanced Tel will not hesitate to enforce these provisions.

#### Traceback

Advanced Tel commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. Advanced Tel cooperates fully with such entities in investigating and stopping any illegal robocallers that use the company's service to originate, carry, or process illegal robocalls.

#### “KNOW-YOUR-UPSTREAM PROVIDER”

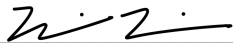
Advanced Tel has “know-your-upstream provider” procedures in place designed to mitigate illegal robocalls. Advanced Tel exercises due diligence before accepting traffic from an upstream provider. It understands its sources of call traffic by maintaining a limited list of vetted and contracted upstream providers. Advanced Tel routinely monitors the Robocall Mitigation Database to ensure that the upstream providers have certification the FCC's Robocall Mitigation Database. Advanced Tel is incorporating traceback and prohibited unauthorized IP traffic language in all contracts with upstream providers.

#### CALL ANALYTICS

Voice providers are required to detail any call analytics systems are used to identify and block illegal traffic, including whether any third-party vendors and the names of the vendors. As detailed previously, Advanced Tel uses the following vendors for call analytics services to identify and block illegal traffic: TNS Call Guardian services and Clear IP.

#### Certification:

On behalf of Advanced Tel, L.L.C., I certify that all calls that originate on Advanced Tel's network are subject to the attached Robocall Mitigation Plan, that any prior certification has not been removed by FCC action nor has Advanced Tel been prohibited from filing in the Robocall Mitigation Database, and Advanced Tel has fully implemented STIR/SHAKEN on any IP portions of its networks.

Signed 

Harris Miller, Chief Operating Officer