



CONTINENTAL DIVIDE ELECTRIC COOPERATIVE, INC.

200 E. High St. • P.O. Box 1087 • Grants, New Mexico 87020 • (505) 285-6656 • Fax (505) 287-2234

CONTINENTAL DIVIDE ELECTRIC COOPERATIVE ROBOCALL MITIGATION PLAN JULY 2025

I. Background

The Federal Communications Commission (“FCC” or “Commission”) required that all voice service providers certify, by June 30, 2021, in the Commission’s [Robocall Mitigation Database](#) whether they have implemented STIR/SHAKEN or, if subject to an applicable extension, that they have documented and instituted a robocall-mitigation plan to help combat the origination of illegal robocalls on their networks.¹ The Commission has explained that a robocall-mitigation program is sufficient if the detailed practices in the plan can “reasonably be expected to significantly reduce the origination of illegal robocalls” and the voice service provider complies with the practices it describes in its filings.

Continental Divide Electric Cooperative (“CDEC”) d/b/a Red Bolt is dedicated to stopping illegal calls from originating on its network, and this document outlines CDEC’s Robocall Mitigation plan current as of the above-referenced date.

II. Commitment to Traceback Cooperation

CDEC commits to timely cooperating with and responding to Traceback requests from the FCC Enforcement Bureau, ITG (or any successor entity designated by the FCC), trace-forward investigations, and other valid law enforcement and government demands, subpoenas, and other valid legal processes. CDEC will dedicate sufficient resources to provide prompt and complete responses to such requests. CDEC will investigate suspicious activity found by its monitoring systems or reported to it by consumers or third parties and take appropriate action.

CDEC has adopted the following additional internal procedures to carry out its commitment to cooperate with Traceback requests and to take appropriate remedial actions when warranted:

- Troy McDowell, CDEC’s Telecommunications Manager, has been designated the responsible manager and will coordinate the handling of all Traceback requests that are received.
- If a traceback request is received, CDEC will email the customer a list of questions necessary to properly investigate the scope of the Traceback request and if the calls are legitimate or not.
- CDEC will also promptly call the relevant customer to inform them of the Traceback request, and that CDEC has sent the customer an email requesting specific information related to the investigation.
- CDEC will separately perform an audit of the subject account, and suspend or terminate the

¹ See <https://docs.fcc.gov/public/attachments/DA-21-454A1.pdf>.



CONTINENTAL DIVIDE ELECTRIC COOPERATIVE, INC.

200 E. High St. • P.O. Box 1087 • Grants, New Mexico 87020 • (505) 285-6656 • Fax (505) 287-2234

account if deemed to be sending illegal content.

- CDEC's goal is to comply with all Traceback requests within 24 hours if commercially reasonable, and sooner when practicable.

III. CDEC's Know Your Customer ("KYC") Standards

CDEC is an electric cooperative that additionally resells retail VoIP service to its residential and commercial customers in select areas of New Mexico. As part of its onboarding process, CDEC undertakes various commercially reasonable precautions to verify a given customer's identity as part of entering into a formal written agreement.

During the initial prospective-customer screening process, CDEC collects the following customer-identifying information when possible:

- Customer name,
- Customer physical address, and
- Customer telephone numbers

IV. Telephone Number Authorization and STIR-SHAKEN Capabilities

As an interconnected VoIP reseller, CDEC is not subject to STIR/SHAKEN implementation requirements, as it lacks control over the network infrastructure necessary to implement STIR/SHAKEN directly. That said, CDEC's understanding is that its underlying service provider is authenticating CDEC's customers' traffic pursuant to STIR/SHAKEN. Further, CDEC customers can only utilize telephone numbers assigned to them, and which are provided for such purposes by CDEC's underlying carrier for their retail use, such that CDEC has a documented, verified relationship between the originating end user and their telephone number(s) used to originate their calls.

V. Additional Information Required By *Sixth Report and Order*

The FCC requires that all voice service providers certify, by February 26, 2024, in the Commission's RMD whether they have implemented the STIR/SHAKEN authentication framework, and that all of the calls that it originates, carries or processes are subject to a robocall mitigation program consistent with the Commission's rules.² The provider's mitigation plan "shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond 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." 47 C.F.R. § 64.6305(a)(2).³

² See <https://docs.fcc.gov/public/attachments/DA-24-73A1.pdf> (WCB Jan. 25, 2024 Public Notice).

³ The TRACED Act defines "robocall violation" as "a violation of subsection (b) or (e) of section 227 of the Communications Act of 1934." TRACED Act § 11(d), Pub. L. No. 116-105, 133



CONTINENTAL DIVIDE ELECTRIC COOPERATIVE, INC.

200 E. High St. • P.O. Box 1087 • Grants, New Mexico 87020 • (505) 285-6656 • Fax (505) 287-2234

CDEC notes that, by design, its services are provisioned to significantly curtail end users' ability to spoof their telephone numbers, or otherwise commit violations of the TCPA. CDEC's end users are retail end users – both residential and small business – that use CDEC's resold VoIP service like traditional POTS service, and not for high-volume use cases. Further, CDEC customers can only use caller IDs that they have verified, through the process described above, as their outbound caller ID, such that, absent some hacking event, which would violate CDEC's AUP, CDEC's end users cannot manipulate their caller ID. Thus, by design, CDEC's end users are prevented from using CDEC's services to violate 47 U.S.C. § 227(e).

The FCC's rules contemplate that the provider's plan should describe how it “complies with its obligation to know its customers pursuant to § 64.1200(n)(4), any procedures in place to know its upstream providers, and the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s).” 47 C.F.R. § 64.6305(d)(1)(ii). The Commission has acknowledged, however, that, “we do not currently require [] providers other than gateway providers to engage in ‘know-your-upstream-provider’ procedures, [but] if they have put such procedures in place, they must be documented in their robocall mitigation plan,” and that “we do not specifically require providers to use call analytics.” *Sixth Caller ID Authentication Report and Order* ¶ 40 & n.155-56. That said, CDEC directs the Commission to its KYC standards detailed above.

Stat. 3274 (2019); *id.* at § 13(d)(f)(3) (defining a “suspected unlawful robocall” as a “call that the Commission or a voice service provider reasonably believes was made in violation of subsection (b) or (e) of section 227 of the Communications Act of 1934.” Thus, CDEC's training and mitigation efforts focus, consistent with the TRACED Act, on potentially unlawful calls that violate either (a) 47 U.S.C. § 227(b) (governing non-emergency calls initiated with a prerecorded or artificial voice or an automatic telephone dialing system, as that term has been interpreted by the Supreme Court in *Facebook, Inc. v. Duguid*, 592 U.S. 395 (2011)) or (b) 47 U.S.C. 227(e), or the Truth in Caller ID Act, which prohibits people from causing “any caller identification service to knowingly transmit misleading or inaccurate caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value,” absent an applicable exemption.