



ROBOCALL MITIGATION PROGRAM

Introduction

This Robocall Mitigation Program outlines the compliance practices of Baltimore-Washington Telephone Company ("BWT"), with regards to its efforts to reduce and eliminate unlawful robocalls traversing its network. This program is implemented throughout the organization in the form of policies and practices as necessary to ensure compliance.

Business Name and Primary Address

Baltimore-Washington Telephone Company
4422 N Ravenswood, #55
Chicago, IL 60640

Baltimore-Washington Telephone Company is sometimes referred to as BWT or BWTel.

OCN

Baltimore-Washington Telephone Company has been issued the following OCNs:

- 357G
- 358G
- 412G
- 782G
- 817G
- 8697

Service Provider Type

BWT is a domestic entity that operates as a Voice Service Provider and an Intermediate Provider. BWT is not a foreign voice service provider. It is licensed as a competitive local exchange carrier and interexchange carrier.

Robocall Mitigation

All of the calls BWT originates on its network are subject to this robocall mitigation program. BWT has had no prior certification removed by Commission action and has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

During the prior two years, BWT (nor any entity for which BWT shares common ownership, management, directors, or control) has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Program Details

BWT's Robocall Mitigation Program begins with its employee training. All employees are trained on the basics of robocalls, on BWT's Mitigation Program, and on BWT's Know Your Customer (KYC) standards. Within the lifecycle of a customer, BWT repeatedly performs KYC applicable to the phase of lifecycle. BWT reviews prospective customers for red flags. It then reviews customers corporate structure and attempts to confirm it is working with a given, known entity. It reviews customer use cases and identifies appropriate risk management for the customer. When appropriate, it reviews Robocall Mitigation Programs. FCC records are reviewed to identify possible past compliance history. Throughout a customer's lifecycle, changes such as traffic patterns, corporate names, or regulatory action often also triggers a re-review of a customer's risk profile.

Beyond KYC, BWT monitors customer traffic with proprietary algorithms, reviewing against known bad traffic patterns and behaviors. In addition to internal signs, any complaints or enforcement actions trigger immediate review.

BWT also compares calls to block lists, including its own lists and Do Not Originate lists. It does not accept unsigned calls for transit, and validates all calls originating from, transiting, or terminating to its network.

In so much as BWT is doing business with another service provider, it specifically requires and reviews:

- The legitimacy of the customer entity
- The customer's US address

- Customer's RMD filing
- Customer's 499 filing ID
- Customer website and email address associated with the entity name
- STIR/SHAKEN deployment

Know Your Customer

BWT requires its customers to provide sufficient information to determine their identity, relative to the risk they pose to the network. This includes reviewing and verifying, to the best of BWT's ability, the corporate entity information, the FCC registration number, 499 filer, and Robocall Mitigation Database filing. BWT only accepts traffic from service provider customers who have current Robocall Mitigation Database filings. BWT verifies the provider has affirmatively submitted the filing, and that filing has not been de-listed pursuant to an enforcement action.

Traceback Handling

BWT will respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium ("ITG") within 24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use BWT's network and services to originate, carry or process calls.

The person responsible for addressing robocall mitigation-related issues, and the primary contact for Tracebacks is:

Justin Newman, President, Baltimore-Washington Telephone Company
4422 N Ravenswood Ave., #55, Chicago, IL 60640.
rmd-tracebacks@bwtel.com. (312) 748-0375.

Any use of this contact information for purposes other than by regulatory bodies or for robocall mitigation is prohibited.

STIR/SHAKEN Framework

BWT has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates will be compliant with § 64.6301(a)(1) and (2).

Principals, Affiliates, Subsidiaries & Parent Companies:

Baltimore-Washington Telephone Company is a corporation organized in the State of Maryland. Its parent company (100%) is Uptown Moose, LLC., a Delaware limited liability company formerly known as Uptown Moose, Inc.. BWT's president and principal is Justin Newman.

The majority owner and principal of Uptown Moose, LLC. is Justin Newman.

BWT is a domestic service provider.

Uptown Moose also owns a controlling interest in the following entities that also maintain Robocall Mitigation Database filings:

- Cornfield Voice LLC
- Moose Networks, LLC