

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
26-Feb-24	Alteva of Warwick, LLC	Update for compliance with the Sixth Report and Order

This response is submitted on behalf of Alteva of Warwick, LLC, a provider of incumbent and competitive local exchange services.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

Alteva is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Alteva maintains active affiliation with industry representatives (including NECA and several of its equipment vendors) who participate on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as Alteva's third-party representative on the ATIS Non-IP taskforce working group.:

Status of STIR/SHAKEN Implementation

Alteva has implemented the STIR/SHAKEN authentication framework on a portion of its network, and all calls it originates on that portion of its network are compliant with sections 64.6301(a)(1) and (2). Alteva has implemented authentication and verification with STIR/SHAKEN voice traffic that originates and terminates on the IP portions of the company's network that support SIP calls.

Alteva is partnering with a trusted provider to implement STIR/SHAKEN in parts of its network in which it may do so and has implemented this policy for those portions of its network not yet compliant.

II. Robocall Mitigation Plan

Alteva is a voice service provider and all calls that originate on its network are subject to the company's robocall mitigation plan. Alteva uses Call Analytics and Know Your Customer to prevent the origination of robocall traffic on its network. All carriers to which Alteva are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Know Your Customer

Alteva is a small, long established provider that maintains a close relationship with its residential and business subscribers and provides services within its limited geographic footprint. Alteva thoroughly vets new residential and business customers before activating new service or making changes to existing services. Any request for large volume call paths are further reviewed, including a site visit, to verify the nature of the business to prevent the establishment of illegal robocall operations on its network.

Analytics

Alteva has contracted with YouMail, Inc. to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal

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robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Alteva receives alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behavior of our Company's traffic and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs.

General Prohibition Against Illegal Robocalling

Alteva's terms of service and tariffs have strict prohibitions against illegal use of the service including robocalling. To further educate its customers, Alteva posts information on its website, social media, and bill messaging to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and the process to report complaints related to robocall activity.

III. Traceback and Enforcement Cooperation

Alteva will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group. The company commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither Alteva nor any entity with which it shares common ownership, management, directors, or control have 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.