

Robocall Mitigation Program - The Hilliary Companies

This RMP covers the following entities which are referenced through this RMP as the Hilliary Companies.

Company Name	OCN
Border to Border Communications, Inc.	2073

The Hilliary Companies are eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as small voice service providers (§64.6304 (a)(2) that have non-IP portions within its network §64.6304(d).

The Hilliary Companies provide local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of the network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

The networks of The Hilliary Companies also have IP-portions which originate calls via SIP connections to other carriers. The IP calls originating on the networks of The Hilliary Companies are correctly signed and the Non-IP originated calls are not signed.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps the Hilliary Companies have taken to avoid originating illegal robocall traffic.

1. Customer Inability to Spoof Caller ID: All customers of the Hilliary Companies are only able to originate calls from a number that identifies in the companies' switches as a number that has been assigned to them. This prevents the Hilliary Companies' customers from originating calls with a spoofed caller ID number, which greatly mitigates the likelihood of illegal robocalls originating on the networks.
2. Network Monitoring:

The Hilliary Companies do not use call analytics provided by a vendor.

The Hilliary Companies' billing vendors, as well as its underlying long-distance carrier, will notify Hilliary if they observe excessive call volumes or suspicious call patterns originating on a Hilliary customer's line. If Hilliary were to be notified of such an issue, we would contact the customer to investigate the purpose of the calls. If, upon investigation, it was determined the customer was using their voice service to make illegal robocalls, Hilliary would act quickly to put an end to the unlawful activity, and may suspend or terminate the customer's service as appropriate.

In addition, the Hilliary Companies' Network Operations Center (NOC) generate CDR reports to review and identify if suspicious traffic is generated by customers. Also, only originating calls from end users assigned telephone numbers by the Hilliary Companies and / or ported in to the Hilliary Companies are listed in subscriber records to originate traffic. The Hilliary Companies only build translations in the switch for those assigned telephone numbers.

3. *Know-Your-Customer Policy*: The Hilliary Companies' business customers are small businesses that are physically located in the Hilliary Companies service territories. As a result, the Hilliary Companies have never received a request for high-volume origination services. However, were any of the Hilliary Companies to ever receive such a request, we would thoroughly vet the identity of the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.
4. *Know Your Upstream Provider*
The Hilliary Companies know all the carriers from which they receive traffic and have confirmed that all of the carriers are listed in the Robocall Mitigation Database. The Hilliary Companies monitor incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering the networks of the Hilliary Companies. In addition, the Hilliary Companies are now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.
5. *Traceback*
The Hilliary Companies commit 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. The Hilliary Companies commit to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.