



ROBOCALL MITIGATION PLAN

DCM Cable, Inc. d/b/a Bridgenet Communications (“Bridgenet”) is a leading provider of Internet and phone services, serving customers in On Top of The World Communities, Stone Creek, and Calesa Township. Bridgenet was founded by local industry leaders in 1995 with a specific mission: To provide customers high-quality, affordable, and reliable Internet and telephone service. Bridgenet offers its customers Voice Over Internet Protocol (VoIP) services as a reseller of white-labeled services offered by Momentum Telecom Inc. (“Momentum”). Bridgenet does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, Bridgenet does not have the facilities necessary to implement STIR/SHAKEN. Bridgenet has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

Bridgenet follows the best practices for the implementation of call authentication frameworks recommended by the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group [NANC CallerID Best Practices](#). This includes confirming the identity of Bridgenet customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

As a smaller service provider, understanding the service needs of each individual customer is part of our customer relationship and sales process. This understanding provides us with an ability to mitigate the potential of a customer initiating illegal robocalls before they have an opportunity to connect to our services.

Bridgenet’s services are targeted to residential and small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

Customers using our services agree to abide by the rules and regulations listed in our service agreement. Bridgenet’s service agreement expressly prohibits customers/subscribers from engaging in illegal activity, including creating a false Caller ID (i.e. spoofing) and robocalling.

Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.



II. TRACEBACK

Bridgenet commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, Bridgenet will cooperate with such entities' investigation.

III. ROBOCALL MITIGATION

Bridgenet has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

As a reseller of telephone service through a hosted VoIP, broadband service and unified communications provider, Bridgenet relies on the offerings and capabilities of its voice service vendor, Momentum. Momentum, has committed to fully complying with Commission's robocall blocking requirements and has confirmed that it will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITF. Momentum also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

IV. KNOW YOUR UPSTREAM PROVIDER

Bridgenet has an agreement in place with Momentum to resell Momentum's VoIP offering to Bridgenet's customers. Bridgenet has confirmed that Momentum is listed in the Robocall Mitigation Database and that Momentum has Know Your Upstream Provider provisions in place.

V. CALL ANALYTICS SYSTEMS

Bridgenet relies upon Momentum's call analytics systems to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. Momentum's call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring. Momentum's call analytics also can detect where the calling number is invalid, unallocated, or on ITG's Do Not Originate ("DNO") list. If Momentum's call analytics detect any of the above-described issues, an internal report is generated that summarizes the issues presented and the applicable wholesale or retail customer that is responsible for the underlying calls.



In the event that Momentum's analytics report indicates potential illegal robocall activity by a wholesale end user customer, Momentum alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Momentum: (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue.

In the event that Momentum's analytics report indicates potential illegal robocall activity by one of its own retail customers, Momentum conducts its own investigation into the customer and the calls at issue. After concluding its investigation, Momentum will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service and/or reporting the misconduct to the appropriate authorities.

VI. PLAN UPDATES

Bridgenet will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.