

February 11, 2026

STIR/SHAKEN Implementation

USFon is a small, non-profit CLEC that provides voice and broadband service in rural Texas. USFon complies with the requirements of 47 C.F.R. §64.6303(a)(2). USFon has no affiliates, subsidiaries, or parent companies. Management of USFon consists of its President, Brian DeHaven, and Controller, Terri Richter. USFon board members are: Lowell Feldman (Chairman), Brett Perlman, and Greg Hudson.

For the portions of USFon's network where it can initiate, maintain, and terminate SIP calls, USFon has implemented the STIR/SHAKEN authentication framework.

Accordingly, USFon has certified under Option 1 that all of the voice traffic that originates on its network is authenticated with STIR/SHAKEN. The voice traffic originating and terminating on the IP portion of USFon's network is authenticated using Inteliquent STIR/SHAKEN products and services. This service provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We immediately investigate any identified suspicious calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

All voice traffic is subject to the Robocall Mitigation Plan outlined below.

Robocall Mitigation Plan

Pursuant to 47 C.F.R. § 64.6305, USFon has implemented the Robocall Mitigation Plan summarized below to prevent and mitigate the origination of illegal robocalls as of June 30, 2021. USFon may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

This Robocall Mitigation Plan describes the specific measures that USFon has implemented to detect and prevent illegal robocalls on its network as of December 15, 2025. USFon will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should USFon determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment: USFon is a small CLEC offering voice calling services to a few residents in rural Texas. Its customers generally do not originate high volume calls, and USFon has not received information suggesting that robocalls originated on its network. Therefore, USFon considers its network at a very low risk of originating illegal robocalls.

Customer Due Diligence: USFon examines all new and renewing customers, confirming the identity of the customer including confirming the customer's service address. USFon verifies a customer's credit history and business reputation prior to providing service. USFon verifies customer information when contracts are renewed, or services are added. USFon verifies the customer's identity and their right to use the telephone number presented on calls. USFon maintains close personal knowledge of the needs of its customer base. USFon's standard current customer service agreement states that all customers are expected to use their services only for legal purposes and USFon's policies define the circumstances by which it will deny, suspend or terminate service to a customer, including if a user breaches the customer service agreement. Therefore, if a user is found to be originating robocalls, USFon clearly has the right to terminate that user's services.

Network Monitoring: USFon uses a call report to monitor traffic on its network and identify potentially unlawful call origination activity. If USFon has a reasonable basis to believe that a customer is originating illegal robocalls, USFon will investigate and will require the customer to remedy the problem. If effective action is not taken, USFon can suspend and/or terminate service to the customer.

Responding to Traceback Requests

USFon will respond promptly to traceback requests received from the Commission, law enforcement, and the Industry Traceback Group ("ITG") and will cooperate with those entities in investigating and stopping any illegal robocallers that use USFon's service to originate calls. If a pattern of questionable activity is detected, USFon will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Do Not Originate

USFon has implemented systems to utilize NetNumber, Inc.'s Dynamic DNO service that is used to screen calling numbers (or when present, p-asserted identities) for incoming calls. This is a query-based service allowing for only the most up-to-date data to be used for call screening. Calls where NetNumber Dynamic DNO queries return a "do not originate" status are rejected and not allowed to continue on to USFon customers. Outbound voice traffic is not screened as customers are not able to change their caller ID or p-asserted identity and can only make calls from their assigned numbers. USFon does not offer a texting service.

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