

Grizzly Broadband, LLC

Robocall Mitigation Certification and Plan

Grizzly Broadband, LLC (Grizzly Broadband or Company), a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the Federal Communications Commission's (Commission's or FCC's) rules. As a provider of both internet and voice services, we ensure that all voice traffic originating from our network complies with the STIR/SHAKEN protocols and adheres to strict verification and monitoring standards.

STIR/SHAKEN

Grizzly has "complete" STIR/SHAKEN implementation. Grizzly Broadband is a voice service provider with a STIR/SHAKEN obligation serving end-users; all calls that the Company originates are compliant with section 64.6301(a)(1) and (2) of the FCC's rules.

Enforcement

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. Grizzly Broadband reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Grizzly Broadband and/or any entity for which the filing entity shares common ownership, management, directors, or control have never 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Grizzly Broadband has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

Grizzly Broadband commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Grizzly Broadband will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

Identifying and Other Information

Grizzly Broadband, LLC
2134 N First St, Hamilton Montana 59840

Other business names used by the provider:

All business names previously used by the provider:
Cybernet1, Inc.; Hamilton Computer Service

Grizzly Broadband is not a foreign voice service provider.

Operating Company Number ("OCN"):

Parent Company: Ravalli Electric Cooperative

Principals: Mark Grotbo

Affiliates: none

Subsidiaries: none

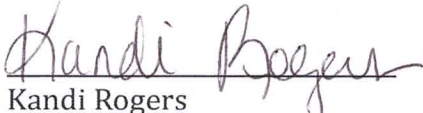
Person within company responsible for addressing robocall mitigation-related issues:

Radar Moore, Network Administrator

Networking Operations

Email: radar@grizzlybb.com; Phone: 406-363-2183

I, Kandi Rogers, COO, for Grizzly Broadband, LLC, submits this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.


Kandi Rogers
Chief Operating Officer

04/29/2024
Date

Robocall Mitigation Program

Grizzly Broadband, LLC has implemented specific reasonable steps to mitigate the risk of carrying or processing illegal robocalls on behalf of its customers.

Traffic Analysis and Monitoring:

- Utilization of internal systems to monitor and analyze call patterns for signs of robocall activity, with immediate actions taken to block suspicious traffic;
- Customer Education and Blocking Tools: Provision of tools to customers for reporting and blocking unwanted calls, and education on practices to avoid robocall scams;
- Vendor and Third-Party Carrier Management: Ensuring that all third-party carriers from which we accept traffic are registered in the FCC's Robocall Mitigation Database and comply with robocall mitigation practices.

Blocking Policy:

- Implementation of automatic call blocking for numbers identified in Do Not Originate (DNO) lists;
- Real-time addition of suspicious numbers to blocking lists based on traffic analysis.

Know-Your-Customer. As a smaller service provider, Grizzly Broadband maintains close relationships with our customer base, which primarily consists of users who also subscribe to our internet services. This close relationship aids in the effective monitoring and regulation of call traffic to prevent abuse. Our customer vetting process is thorough and includes:

- Verification of business name, address, and contact information at the initiation of service (signup);
- Additional verification steps involving the provision of government-issued ID and credit card information, ensuring that all details align and are legitimate; and
- Direct communication with customers to understand their typical use of phone services and ensure compliance with legal standards.

Know-Your-Upstream Provider. Grizzly Broadband ensures that all third-party carriers from which we accept traffic are registered in the FCC's Robocall Mitigation Database and comply with robocall mitigation practices.

Traceback. Grizzly Broadband will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

Regulatory Compliance and Updates. Grizzly Broadband LLC commits to regularly updating our robocall mitigation strategies in response to evolving industry practices and regulatory requirements. Any significant changes to our plan will be communicated to relevant personnel and filed with the FCC Robocall Mitigation Database within ten days of such updates. For further details or concerns regarding our Robocall Mitigation Plan, please contact Radar Moore at noc@grizzlybb.com