

Robocall Mitigation Plan

Mercury Broadband, LLC (Mercury Wireless Indiana, LLC) (Mercury Wireless Kansas, LLC) (Mercury Access Solutions) is an Interconnected Voice over Internet Protocol service provider (VoIP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that all VoIP providers certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VoIP providers develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

Mercury Broadband, LLC utilizes VoIP Innovations, who provides crucial elements of our RMP as part of their interconnected VoIP wholesale services.

STIR/SHAKEN Extension

Mercury Broadband was eligible for and took the STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

International Subscribers

Mercury Broadband, LLC does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

Mercury Broadband, LLC maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Mercury Broadband, LLC's broadband or voice services. Among other things, this AUP prohibits: using the service in connection with fraudulent activities and violating any local, state, or federal law.

Traceback Requests

Mercury Broadband, LLC is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, and the industry traceback consortium. Furthermore, Mercury Broadband, LLC is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Mercury Broadband, LLC service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to regulatory@mercurybroadband.com for immediate processing by Mercury Broadband, LLC.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by Mercury Broadband, LLC then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to Mercury Broadband, LLC of authorization to use a TN, documentation will be provided to VoIP Innovations so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, VoIP Innovations, provides filtering and call limitations to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Mercury Broadband, LLC will immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Mercury Broadband, LLC determines that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Repeated calls to a specific called number within a short period
- Repeated calls to a specific called geographic location within a short period
- Slow traffic pumping of repeated calls to a specific called geographic location within a short period
- Repeated calls to high-cost geographic location within short period
- Call volumes vs weekly trends
- Number of unique destination numbers within a short period
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation

As a voice service provider with fewer than 100,000 subscribers, Mercury Broadband was allotted an extension to implement STIR/SHAKEN caller ID authentication into its voice network. Mercury Broadband, LLC completed its implementation ahead of the due date, and is currently utilizing the necessary authorizations and certificates needed to continue to be compliant under STIR/SHAKEN. Mercury Broadband, LLC remains committed to effectively mitigate and prevent illegal robocall traffic originating on its voice network.