

CITY OF ELBERTON

ROBOCALL MITIGATION PLAN

The City of Elberton is a Georgia municipality that provides broadband Internet access to its community. The City also offers interconnected VoIP services to its subscribers on a resold basis through its wholesale VoIP providers, Alianza, Inc. ("Alianza") and ClearlyIP Inc. ("ClearlyIP").

While the City necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Alianza and ClearlyIP, it has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Alianza, ClearlyIP, or their downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: The City vets the identity of its customers when approving an application and entering into contracts for telephone service. As part of this vetting process, the City collects the customer's legal name and address, physical location, contact information, and, for commercial customers, federal tax ID, jurisdiction of incorporation, and the nature of the business, and may require additional information to validate the customer. In some instances, the City also utilizes third-party agencies for additional information regarding the credit and/or fraud risk associated with a potential customer. The City's services are provided to fixed locations using its own network and services are typically installed on location by its personnel, so the City knows the actual location of its customers. All of this information enables the City to validate the identity of potential customers prior to provisioning of service. The City will not provide service if a new customer's identification cannot be verified.

Service Terms: Customers that use the City's telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

As a reseller, the City necessarily relies on its wholesale providers to monitor and detect patterns indicative of potential unlawful robocalls and to block such calls. While Alianza and ClearlyIP have not reported the use of any third-party call analytics systems in their robocall mitigation plans on file with the FCC, they have reported that they use their own systems to detect illegal robocalls. Alianza reports the implementation of a proprietary "fraud detection and mitigation process for high-volume network traffic to evaluate compliance with fraud detection indicators and fraud prevention best practices" and states that its fraud detection system triggers would notify the City "of potentially fraudulent activity" originating from the City's end-user customers. ClearlyIP reports that it works to detect calling patterns consistent with illegal robocalls.

If the City receives a notification from Alianza or ClearlyIP of suspected unlawful robocall traffic originated by a City's end user customer, the City will conduct an investigation. To the extent a customer is found to have violated the City's terms of service, the City 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.

Knowledge of Upstream Providers

The City's upstream providers, Alianza and ClearlyIP, are registered in the FCC's Robocall Mitigation Database. The City does not have knowledge or insight into the upstream providers from which Alianza and ClearlyIP receive traffic but understands from their mitigation plans that their direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

The City is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by its customers, and will cooperate with Alianza and ClearlyIP on traceback requests.