



NORTH COAST ROBOCALL MITIGATION PLAN

North Coast Wireless Communications, LLC (“North Coast”) is a small broadband and VoIP service provider operating in Ohio. It is “small voice service provider” under FCC rules because it has fewer than 100,000 voice subscriber lines. 47 C.F.R. § 64.6304(a), as amended by the Fourth Report and Order, FCC 21-122 (Dec. 9, 2021). Further, North Coast is a facilities-based small voice service provider because it owns and operates fiber-based and fixed wireless-based networks that provide the connections for the VoIP service sold to North Coast’s subscribers. Id., at ¶¶ 14-20; 47 C.F.R. §64.6300(g).

North Coast has implemented the following robocall mitigation program for its networks that provide VoIP service:

- North Coast has implemented reasonable steps to avoid originating illegal robocall traffic:
 - Know Your Customer: Prospective new voice service customers must speak with a North Coast customer service agent to order voice services; there is no mechanism allowing voice service initiation without that human touch. North Coast obtains the name and physical location of all subscribers prior to initiating service. Additionally, North Coast thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.
 - North Coast’s written terms of service prohibit any subscriber from inappropriate usage of North Coast’s services, including but not limited to the transmission of any data which violates any federal, state or local regulation. North Coast reserves the right to terminate service for failure to comply with its terms of service.
 - North Coast connects to the Public Switched Telephone Network through a third-party SIP origination/termination service provider; North Coast believes that service provider is compliant with STIR/SHAKEN requirements.
 - North Coast’s VoIP subscribers can only use telephone numbers obtained from North Coast to originate and terminate telephone calls.
 - North Coast’s Class 4 softswitches have trunks only to North Coast’s class 5 softswitches. All access to the public Internet is protected by inbound and outbound access lists and firewalls. North Coast’s Class 4 softswitches are connected to end users on a private network.



- Class 5 softswitches have static IP routes to only North Coast's class 5 softswitches on the public Internet and North Coast's class 4 softswitches on the private network. All other access from the public Internet is denied and protected by inbound and outbound access lists and firewalls.
- North Coast shall respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

North Coast Wireless Communications, LLC
143 Erie Street
Wellington, Ohio 44090
matt@ncwcom.com
440-647-5626