

Bresco Solutions, LLC
dba Bresco Broadband
Robocall Mitigation Plan
December 30, 2024

1. Purpose of Robocall Mitigation Plan.

Bresco Solutions, LLC dba Bresco Broadband ("Bresco") is dedicated to stopping illegal robocalls calls from originating from its network and to cooperating with the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group.

This document describes its Robocall Mitigation Plan and "reasonable steps" that are being taken to prevent the origination of illegal robocalls as required by the TRACED Act and FCC rules.

2. Company Information.

Bresco is a small broadband Internet provider that also provides voice services over its broadband network using VoIP technology. Bresco utilizes (resells) voice services provided by VoIP Innovations, LLC (OCN 597F), a carrier listed in the Robocall Mitigation Database under number RMD0004048. Bresco provides last mile facilities (i.e., local loop) to its subscribers. It does not have any numbering resources provided by NANPA and relies on VoIP Innovations, LLC to port-in numbers for end user customers and to provide connectivity to the PSTN. In preparation for compliance with the Eight Report and Order, WC Docket No. 17-97, FCC 24-120, released November 22, 2024, Bresco has obtained Operating Company Number (OCN) 654K. It does not have a Study Area issued by the FCC.

3. Role in the Call Chain

Bresco is a "non-facilities-based small voice service provider" as that term is defined in 47 CFR §64.6300(h).

4. Implementation of STIR/SHAKEN in the IP Portion of its Network.

Effective June 30, 2022, Bresco implemented STIR/SHAKEN throughout its network as required by 47 CFR § 64.6304(a)(1)(i). Bresco's network is 100% IP-capable and permits implementation of STIR/SHAKEN in conjunction with its resale voice services provided by VoIP Innovations, LLC.

5. Certification Call Origination Procedures

Bresco certifies that all originating calls on its network are subject to STIR/SHAKEN protocols. VoIP Innovations, LLC, the carrier providing the interface to the PSTN, performs the STIR/SHAKEN functions and utilizes a call analytics system to continuously monitor calling patterns and perform call analytics. VoIP Innovations, LLC is a subsidiary of Sangoma US Inc.

6. Participation in Traceback.

Bresco certifies that it will respond fully, within 24 hours, to all traceback requests from the Federal Communications Commission ("FCC"), law enforcement and the Industry Traceback Group ("ITG") and will fully cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls. A single point of contact has been established to respond to any requests.

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Bresco follows the *ITG Policies and Procedures* document, including the *Provider Traceback Best Practices* contained in Appendix A. (This document is available at: <https://tracebacks.org/itg-policies-and-procedures/>).

7. Eligibility to Participate in the Robocall Mitigation Database.

Bresco certifies that it has not been barred or prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action. It further certifies that other than FCC Order DA 24-1235 released December 10, 2024 notifying Bresco to cure their deficient Robocall Mitigation Database filing, that the company has not at any time in the prior two years, 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 the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

8. Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls: Subscriber Vetting (Know Your Customer, Customer Identification and Due Diligence).

Bresco utilizes the three key components of Know Your Customer ("KYC") plans required in the financial services industry: Customer Identification, Customer Due Diligence, and Ongoing Monitoring. In addition, the company utilizes *Best Practices for the Implementation of Call Authentication Frameworks* published by the NANC Call Authentication Trust Anchor Working Group. (This document is available at:

<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf> and FCC Public Notice DA 20-1526, released December 22, 2020).

Vetting of subscribers, particularly business subscribers that purchase service capable of supporting high call volumes, involves obtaining information such as:

- Legal business name and trade names
- Federal tax ID
- State of Incorporation (only for foreign corporations)
- Nature of the business
- Primary contact person
- Service addresses

If the business were a wholesale customer of Bresco, additional information would be required such as:

- OCN(s) and proposed use of wholesale services
- FCC Form 499-A Filer ID Number
- FCC Form 499-A filing status
- Robocall Mitigation Plan content and filing status

Vetting of residential and small business customers involves obtaining information such as service address, billing address, primary location, and responsible party as part of normal business practices.

New and renewing customers will be subject to service agreements and acceptable use policies that are designed to mitigate illegal robocalls. Failure to comply with the agreements and policies regarding illegal robocalls may result in service being discontinued.

9. Telephone Number Validation (KYC – Monitoring).

Bresco relies on VoIP Innovations, LLC to manage the telephone number inventory since it provides the switch and the PSTN interface. Part of managing this inventory includes the identification of active numbers that are assigned to specific customers. This forms the basis for Telephone Number Validation for outgoing calls. The central office switch uses the assigned number information to prevent calls using a telephone number (ANI) that is not assigned to the customer originating the call. This prevents the use of unassigned numbers or numbers assigned to another customer. If the customer has legitimate rights to utilize a telephone number that was not assigned by VoIP Innovations, LLC, such as an 8YY number that belongs to the customer's corporate office, proof is

required before that specific ANI will be permitted to originate calls. The switch also has the capability to provide statistical reports on originating voice traffic to assist in detecting traffic patterns associated with illegal robocalling.

10. Third-Party Validation and Real-Time Network Monitoring (KYC – Monitoring).

Bresco's resale partner utilizes the Zabbix monitoring system from Zabbix, LLC (or an equivalent system) that captures call details and provides call analytics, responses, and reports in real-time to process calls on its IP Network. Originating ANI is checked against multiple databases to determine if the number is invalid, on a DNO list (Do Not Originate), known robocall number list, etc. This initial screening augments the process described in the Telephone Number Validation section.

The use of call analytics, alerts and reports allows Bresco to immediately contact the customer to discuss unusual calling, determine if illegal robocalls are involved and provide necessary warnings or terminate the service. The system also produces real-time reports that provide details of all outbound network calling, including date, time, ANI, call volume, duration and other details that will assist in identifying calling patterns and detecting deviations from normal patterns.

11. Know Your Upstream Providers.

Bresco is a small voice service provider with a single upstream provider (VoIP Innovations, LLC) through which all calls flow as they enter or exit the PSTN. Bresco has a longstanding relationship with its upstream provider and maintains an awareness of their nature of business and the legitimacy of their call transmission services. The Robocall Mitigation Database is monitored to ensure that all upstream providers have current mitigation plans and that none have been suspended or revoked by the FCC. Upstream provider Mitigation Plans are reviewed for the details of their actions to mitigate illegal robocalls. Bresco will not accept direct traffic from any voice service provider or gateway provider that is not listed in the Robocall Mitigation Database.

12. Accepting Calls from Non-Gateway Intermediate Providers.

Pursuant to the *Sixth Caller ID Authentication Report and Order*, Bresco will not accept any traffic directly from a non-gateway intermediate provider not listed in the Robocall Mitigation Database, effective May 28, 2024.

13. International Services.

Bresco does not sell any services to international call originators using NANP number resources.

14. Mitigation Plan Revisions.

Bresco is committed to update this plan as conditions change. The Robocall Mitigation Database will be updated within ten (10) business days of any substantial changes to the current plan.

15. Principals, Affiliates, Subsidiaries, and Parent Companies.

Bresco Solutions, LLC dba Bresco Broadband

Kerry Keown – President
Nicholas Hunter – Vice President
Drew Hunter – Chief Executive Officer
Sean Murphy – Chief Financial Officer
Corey Jensen – Chief Administrative Officer
Timothy Berelsman, Manager
Nicholas Hunter, Manager

Affiliates

Ohio Gig, LLC
TAK Group, LLC
Cara Zale Fund II, LLC

Subsidiaries

None

Parent Company of Bresco Solutions, LLC dba Bresco Broadband

614 Gig, LLC