

Robocall Mitigation Plan

Rocky Mountain systems, inc. is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs 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 VSPs 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

Rocky Mountain systems, inc. purchases origination, termination, and hosted-switch access from ANPI (FRN 0020321576) ("Vitelity") who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to Rocky Mountain systems, inc..

STIR/SHAKEN Extension

We are eligible for and are taking 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>). *It is a good idea to read these recommendations and provide specifics on what you do.*

International Subscribers

Rocky Mountain systems, inc. does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

Rocky Mountain systems, inc. maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Rocky Mountain systems, inc.'s broadband or voice services. Among other things, this AUP prohibits:

List items your AUP prohibits, such as using the service in connection with fraudulent activities, violating local/state/federal law, etc.

Traceback Requests

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

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 Rocky Mountain systems, inc. or our Provider, 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 Rocky Mountain systems, inc. of authorization to use a TN, documentation will be provided to Provider so that they can attest calls originated with these TNs.

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

Our Provider ANPI uses Vitelity's solution 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 Provider 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. Provider will immediately ask Rocky Mountain systems, inc. to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Rocky Mountain systems, inc. or Provider 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
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- 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
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Provider has committed to Rocky Mountain systems, inc. Provider has confirmed to Rocky Mountain systems, inc. that it is currently authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on our network.