

**Delta Telecom, Inc.**  
**Robocall Mitigation Plan**

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## **Introduction**

This document details the reasonable steps and actions taken by Delta Telecom, Inc. (“Delta Telecom” or the “Company”) to mitigate and eliminate illegal robocalling. Delta Telecom has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Delta Telecom provides retail Voice-over-Internet Protocol (“VoIP”) calling service. All telecom services are provided on a resale-only basis. As a telecom reseller, Delta Telecom is dependent on our underlying providers’ assistance with monitoring their networks for fraudulent voice calling patterns. Our underlying providers are Talking Platforms, Cloudco, VOIP Innovations and Spectrum. Delta Telecom does not own or control facilities within the network infrastructure that would enable it to implement the STIR/SHAKEN authentication framework. Accordingly, the Company is exempt from a STIR/SHAKEN implementation obligation. See First Caller ID Authentication Report and Order, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

## **Knowledge of Underlying Provider**

Delta Telecom executed a Master Service Agreement with its underlying carriers and has received written assurances from their officials that it will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Delta Telecom. Delta Telecom and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

## **Knowledge of Customers**

Due diligence is performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. Delta Telecom requires a physical business address that passes USPS validation as well as a contact person and a credit check of the business. The Company also requires the customer to sign an attestation they have the right to use the telephone number and supply a current bill showing the telephone number is active and assigned to them.

Delta Telecom will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Delta Telecom’s strict policies and contractual terms as defined in our Master Services Agreement prohibiting the act of fraudulent voice activity as a condition of doing business with Delta Telecom. Our prospective customer shall be responsible for, and agrees to comply with, all laws, statutes, ordinances and/or regulations applicable to prospective customer’s business and its use of Delta Telecom services.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Delta Telecom as a customer and any existing customer relationships could potentially be severed.

### **Traceback Requests**

Delta Telecom is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Delta Telecom will devote sufficient resources to provide prompt and complete information to traceback requests. The company has established a specific email address for to handle all traceback requests that is directed to all members of the Voice Assurance Team. The on-call member of the team will respond to the request to investigate call detail records as detailed in the request to determine if the traffic is originating from non-owned numbers.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Delta Telecom immediately begins rejecting all traffic from the offending customer.

### **Telephone Numbers**

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Delta Telecom and/or obtained by Delta Telecom from Delta Telecom’s underlying carrier for use by the subscriber. Numbers can also be allocated by Delta Telecom or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, Delta Telecom and our underlying provider allow calls to be connected. This screening capability enables an automated and secure method of validating originating telephone numbers.

### **International Calling**

Delta Telecom is not currently an international voice services provider. If at any time Delta Telecom does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full

vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

### **Call Analytics**

As a reseller, Delta Telecom must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices. In our efforts, Delta Telecom does monitor for calls to be sourced only from known locations and known DID's/TN's.

### **Ongoing Robocall Mitigation**

Delta Telecom monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher than normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages.

### **Delta Telecom Contact for Robocall Mitigation-Related Issues**

Please direct any questions related to Robocall Mitigation issues to:

|       |                            |
|-------|----------------------------|
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