

CITY OF MONROE

ROBOCALL MITIGATION PLAN

The City of Monroe, Georgia Water, Light, and Gas Commission 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. The City's wholesale VoIP provider is BroadRiver Communication Corporation d/b/a Calltower ("Calltower").

While the City necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Calltower, 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 Calltower and other 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, and may require additional information to validate the customer. The City's services are provided to fixed locations in its jurisdiction using its own network, and its 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, and it 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

The City necessarily relies on Calltower's use of call analytics systems to identify and block unlawful robocall traffic. Calltower's robocall mitigation plan on file with the FCC reports the use of software provided by TransNexus to monitor outbound voice traffic in real time to identify the origination of illegal robocalls through detailed reporting identifying high volume, short duration calls by calling number. Calltower's plan states that it immediately investigates any suspicious activity. If the City receives a report from Calltower of suspected unlawful robocall traffic originated by the City's end user customer, the City will conduct an investigation. To the extent a customer is found to have violated its 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

Calltower is registered in the FCC's Robocall Mitigation Database. The City understands from Calltower's mitigation plan that Calltower's 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 its customers, and will cooperate with Calltower on traceback requests.