

## **Edge Broadband - Robocall Mitigation Plan**

**7-2025**

This Robocall Mitigation Plan is submitted by Edge Broadband (Edge) pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

The Provider does not have a switch but relies on a third-party cloud based BCM One, Inc. brand “Flowroute” and identified as RMD0011562 in the Robocall Mitigation Database. BCM One is headquartered in New York, NY. Please refer to Robocall Mitigation Plan attached following this specific provider’s plan.

Provider, through its agreement with BCM One “Flowroute”, performs the following roles in the call chain:

- Presently, the Provider relies on the continuing extension from STIR-SHAKEN implementation provided under 47 CFR § 64.6304 (d) which exempts from STIR-SHAKEN Caller ID Authentication. Provider does not own or control the network infrastructure to implement Stir-Shaken. This provider does not have a STIR-SHAKEN implementation obligation.

Neither Provider nor BCM One have been prohibited from filing a certification in the Robocall Mitigation Database.

Provider does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Provider uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

### **Know Your Customer**

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated

information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level BCM One “Flowroute” assigns to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, within 24 hours we warn them to stop. If such traffic continues, then we will terminate their service.

### Know Your Upstream Provider

BCM One “Flowroute” has a vetting and review process for upstream providers.

BCM One confirms that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

BCM One requires that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

Refer to the attached Robocall Mitigation Plan by third-party BCM One for more on this section.

### Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Traceback contact is: Brian Madl at 262-458-4220

### Robocall Mitigation Program

Please refer to the BCM One Plan below describing analytics and process.

Provider, together with BCM One “Flowroute”, will immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If it is determined that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we will terminate their service.

## STIR/SHAKEN

BCM One has registered subsidiaries with STI-PA. STIR/SHAKEN certificates are issued by the Certification Authority (STI-CA) that is used when authenticating originated calls. Provider relies upon BCM One "Flowroute" for the attestation and authentication process.

Name of Upstream Cloud Provider: BCM One "Flowroute"

Nature of Business: Hosted Cloud VoIP and SIP Services

Network Location of Upstream Provider: Flowroute Inc.  
295 Madison Avenue, 5th Floor  
New York , NY 10017

Name of contact: Douglas Fechter

Title: CFO

Phone Number: : 212-849-2202

Email Address: [regulatory@bcmone.com](mailto:regulatory@bcmone.com)