

BANDERA ELECTRIC COOPERATIVE, INC.

ROBOCALL MITIGATION PLAN

As part of its Robocall Mitigation Database filing required under the FCC's *Sixth Caller ID Authentication Report and Order* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (Mar. 17, 2023)), this document describes the specific steps that Bandera Electric Cooperative, Inc. is taking to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

I. BANDERA ELECTRIC COOPERATIVE, INC. CORPORATE INFORMATION

Bandera Electric Cooperative, Inc. (BEC) is a Texas corporation. Its primary address is provided within the Robocall Mitigation Database.

BEC certifies it has not been prohibited from filing in the Robocall Mitigation Database and BEC has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), BEC has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, phone number, and email address are available within the Robocall Mitigation Database.

II. STIR/SHAKEN CERTIFICATION

BEC hereby certifies that all voice traffic originating on its network is authenticated in compliance with applicable standards under 47 CFR § 64.6301. BEC provides voice service to end-user customers by reselling voice service provisioned using the Alianza wholesale voice platform. Alianza has certified in the Robocall Mitigation Database that it has implemented STIR/SHAKEN. Alianza is listed as an authorized provider on the Secure Telephone Identify Policy Administrator list.

III. KNOW-YOUR-UPSTREAM PROVIDER PROCEDURES

BEC incorporates by reference the measures implemented by Alianza to know its upstream providers, as reflected in Alianza's Robocall Mitigation Plan. In particular, Alianza has existing agreements with Tier-1 carrier service providers from which it facilitates the provisioning of carrier services to its service provider customers. Alianza has confirmed that each of those carriers are listed in the Robocall Mitigation Database.

IV. KNOW-YOUR-CUSTOMER PROCEDURES

BEC is an electric cooperative that also provides facilities-based broadband and voice services to cooperative members located in our electric service territory and end-user customers in expansion markets outside our electric service territory. All new and renewing voice customers must have a physical location in our service area. As part of our standard operating procedure, BEC will conduct due diligence on new and renewing voice customers, confirming the customer's identity and whether it is a business. If a customer is a business, BEC will confirm contact person(s), physical business location, state incorporation, federal tax ID, and/or nature of the business.

V. FRAUD DETECTION AND ANALYTICS

Our wholesale provider, Alianza, has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. Through this fraud detection and mitigation process, Alianza will notify individual customers (i.e. BEC) of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Alianza and/or BEC may take remedial action against any subscriber's account to prevent or remediate robocalling or other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification of that action and any remedial steps that may be taken to restore service.

VI. COMMITMENT TO RESPOND TO TRACEBACK REQUESTS

BEC commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.