

## DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

As part of Business Telecommunication Systems (BTS) submission to the Robocall Mitigation Database, this document describes (1) the specific reasonable steps BTS has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, (2) its participation as a member of a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution, and (3) its commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping

## EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

BTS has made meaningful investments to implement network upgrades and offer new features to combat illegal robocalls as part of its robocall mitigation program. BTS deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio (“ASR”), and call count carrier/consumer reports. As part of its robocall mitigation program, BTS provides the following solutions on its network to help minimize the impact of illegal or unwanted robocalls on customers:

- **• \_Randomizer:** Utilized for customer traffic which is sent to BTS via a Least Cost Routing (“LCR”) engine. Based on calling party telephone number analytics, an announcement is played to the calling party that requires the calling party to enter two randomly generated digits to complete the call. If the correct digits are not entered, the call will not proceed (machine generated calls presumably are unable to enter the randomly generated digits).
- **• \_Automatic Number Identification (“ANI”) Management:** Utilized for customer traffic which is sent to BTS via a LCR engine. ANI Management is used to identify and block originating telephone numbers that are deemed abusive based on repeat attempts to reach the BTS network.
- **• \_Proactive Blocking:** Applied to all traffic. Per rules adopted by the Commission in FCC 17-151, BTS blocks calls from phone numbers on Do-Not-Originate (“DNO”) lists from US Telecom and Neustar. In certain circumstances, BTS also blocks calls that originate from invalid, unallocated, or unused numbers.

Through reports generated by Call Detail Record (“CDR”) and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, BTS is able to identify potential unlawful robocalling.

In some situations, when BTS suspects it has identified unlawful calling, in addition to taking the steps identified above, it also may contact the party sending BTS the 3

calls (i.e., BTS carrier/provider customer), and request that they work to investigate their customers (e.g., to identify the party sending them the calls, determine whether the calls are un-lawful, and then to eliminate the source of the calling). When BTS believes it has identified fraudulent activity, it reserves the right to take any action it deems necessary to eliminate the fraudulent activity.

### **III. Know Your Customer Program**

BTS has established and implemented comprehensive Know Your Customer (“Customers using BTS supported only equipment, no auto dialers”) policies for any new and existing customers. The objective of our policy is to prevent BTS from being used, intentionally or unintentionally, for spoofed or illegal traffic. Our procedures enable BTS to know and understand its customers and their use policy better, which in turn helps us manage unacceptable traffic.

### **V. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS**

BTS is committed to responding fully and in a timely manner to all traceback re-quests from the Commission, law enforcement, and the industry traceback consortium, and to co-operating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. BTS has also worked with the FTC and state attorney general counsel to participate in traceback efforts, further demonstrating its commitment to such important efforts.