

Robo Mitigation Plan

BEE CREEK COMMUNICATIONS, INC is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. BEE CREEK COMMUNICATIONS, INC. does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, BEE CREEK COMMUNICATIONS, INC. does not have the facilities to implement STIR/SHAKEN

BEE CREEK COMMUNICATIONS, Inc. purchases origination, termination, and hosted switch access from Athermal LLC (FRN 0028070290) who provides crucial elements of our RMP as part of their Interconnected white-label VOIP

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). This includes confirming the identity of BEE CREEK COMMUNICATIONS, INC. customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers' businesses

International Subscribers

BEE CREEK COMMUNICATIONS, INC. does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy and Terms of Service

BEE CREEK COMMUNICATIONS, INC. maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use BEE CREEK COMMUNICATIONS, INC. 's broadband or voice services. Among other things, this AUP prohibits: using the service in connection with fraudulent activities, violating local/state/federal law, etc., including engaging in illegal activity such as creating a false Caller ID (i.e. spoofing) and robocalling. Subscribers using our services agree to abide by the rules and regulations listed in our AUP and terms of service. Subscribers are informed that suspicious activity will be investigated and violations of the AUP or terms of service, to include evidence of the subscriber engaging in illegal robocalling, will result in their services being terminated.

Traceback Requests

BEE CREEK COMMUNICATIONS, INC. commits to respond fully, within 24 hours, is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the industry traceback consortium. Furthermore, BEE CREEK COMMUNICATIONS, INC. is committed to cooperating with such entities in investigating and stopping any illegal robo-callers that use BEE CREEK COMMUNICATIONS, INC. service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to admin@beecreek.net for immediate processing by BEE CREEK COMMUNICATIONS, INC. In the event illegal robo-callers use our system, BEE CREEK COMMUNICATIONS, INC. will cooperate with such entities' investigation.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by BEE CREEK COMMUNICATIONS, INC. or our wholesale partner Atheral LLC, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to BEE CREEK COMMUNICATIONS, INC. of authorization to use a TN, documentation will be provided to Atheral LLC so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, Atheral LLC uses TransNexus's ClearIP solution to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Atheral will immediately ask BEE CREEK COMMUNICATIONS, INC. to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If BEE CREEK COMMUNICATIONS, INC. or Atheral LLC determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period

- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

Know your Upstream Provider

BEE CREEK COMMUNICATIONS, INC. has an agreement in place with Atheral LLC to resell Atheral LLC's VoIP offering to BEE CREEK COMMUNICATIONS, INC.'s subscribers. BEE CREEK COMMUNICATIONS, INC. has confirmed that Atheral LLC is listed in the Robocall Mitigation Database and that Atheral LLC has Know Your Upstream Provider provisions in place.

Plan Updates

BEE CREEK COMMUNICATIONS, INC. will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry