

Blue Water Networks Robocall Mitigation Plan (RMP)

Know Your Customer

Blue Water Networks follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. <https://docs.fcc.gov/public/attachments/DOC367133A1.pdf>

Traceback

Blue Water Networks responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, as well as cooperates with such entities in investigating and stopping any illegal Robocallers that use Ritter's Voice service to originate calls.

STIR/SHAKEN Extensions

Blue Water Networks is eligible for, and is taking the STIR/SHAKEN implementation extension, received under 47 CFR § 64.6304 because Blue Water Networks have fewer than 100,000 voice subscriber lines. All voice traffic that originates on the Blue Water Networks network(s) is subject to the Robocall mitigation program described below.

Robocall Mitigation Program

Blue Water Networks uses internal monitoring and management systems to monitor its outbound voice traffic in real-time to detect and alert Blue Water Networks Support teams to the origination of illegal Robocalls. The software provides detailed reporting, identifying suspected illegal Robocalls, and alerts if Blue Water Networks' VoIP network(s) originates any calls in which the calling number is invalid, unallocated, appears in a "Do Not Originate" list in the FCC consumer complaint database, OR has a poor reputation score.

Blue Water Networks has implemented internal processes to immediately investigate, within reasonable timeframes, any identified calls to determine if the caller was attempting to originate unlawful/illegal Robocalls that would fall within FCC guidelines.

If Blue Water Networks determines that the caller was attempting to originate unlawful/illegal Robocalls, Blue Water Networks will take action by means of written/electronic/verbal warning to stop the offending practice and/or, under FCC guidelines for Robocall Mitigation under the TRACED Act, may terminate the service as deemed appropriate.