



City of LaGrange
Telecommunications
309 Church St.
LaGrange, GA 30240
General: 706-883-2003
Emergency: 706-883-2008

Robocall Mitigation Plan

Summary

The City of LaGrange, Georgia is a municipal provider of broadband Internet access serving its community that offers interconnected VoIP services. This document details the efforts taken by the City to comply with FCC regulations related to robocall mitigation and call authentication.

Know-Your-Customer Policies

Subscriber Vetting: The City of LaGrange knows its customers and vets the identity of its customers when approving an application and entering into a contract for telephone service. The City's services are provided to fixed locations within The City of LaGrange using its own network and services are typically installed on location by its personnel, so The City of LaGrange knows the actual location and identity of its customers. The City collects the customer's legal name and contact information. All of this information enables The City of LaGrange to validate the identity of potential customers prior to provisioning of service, and it will not provide service if a new customer's identification cannot be verified.

Service Terms: Customers that use the City's telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

The City of LaGrange necessarily relies on its wholesale and STIR/SHAKEN provider, Bandwidth.com, for the use of call analytics systems to identify and block unlawful robocall traffic. If The City of LaGrange receives a report or alert from Bandwidth.com of suspected unlawful robocall traffic originated by its end user customer, the City will promptly investigate and respond. If the City determines that the caller was attempting to originate unlawful robocalls, then it will either warn them to stop or terminate their service as appropriate.

Knowledge of Upstream Providers

The City accepts traffic only from providers that are registered in the robocall mitigation database and that have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

The City is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by its customers. All requests should be directed to telecomorders@lagrange.ga.gov. Upon receiving such notice, the City of LaGrange will promptly investigate and respond. If the City determines that the caller was attempting to originate unlawful robocalls, then it will either warn them to stop or terminate their service as appropriate.



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Additional Mitigation Measures

- The City of LaGrange blocks tandem traffic and only carries terminating and originating traffic.
- Call forking through Session Boarder Controllers is disabled.
- Business customers utilizing PRI and SIP Trunk service are blocked from originating calls from any number that is not assigned to them.
- SIP trunk service is only provided over a private Ethernet network and not over the Public Internet.
- Call Control Information (Caller ID, originating number) for all other subscriber lines is controlled by the City's switch and customers can only place calls from their own phone number.
- High volume calling generates alarms that are actively monitored and investigated.
- All Inbound calls are blocked if they originate from invalid or blacklisted numbers or do not contain caller-ID information.
- Call Detail Records are created for every call and stored for five years.
- The City of LaGrange has systems in place to capture and analyze detailed call information (originating number, trunk, IP, call flow messages) for all calls in real time. These records are archived for seven days.