

Robocall Mitigation Program

Los Alamos Commnet Inc

(d/b/a Los Alamos Network)

1. Company Overview

Los Alamos Commnet Inc (“Los Alamos Commnet,” doing business as “Los Alamos Network”) is a small, facilities-based internet and voice service provider based in Los Alamos, New Mexico. We primarily serve **local residential and small business customers** within our community.

Our business model is focused on providing high-quality broadband and voice services to end users. We **do not** market or sell services to high-volume telemarketers, lead-generation outfits, call centers, or other entities whose primary activity is outbound telemarketing or mass robocalling.

Los Alamos Commnet is committed to complying with all applicable Federal Communications Commission (“FCC”) rules and industry best practices for preventing and mitigating illegal robocalls originating from or transiting our network.

2. Role in the Call Chain and Services Provided

Los Alamos Commnet provides:

- Broadband internet access to residential and small business customers; and
- VoIP-based voice services to those same customers.

In the voice call chain, Los Alamos Commnet acts as a **voice service provider serving end users**. We originate calls from our customers and hand them off to an upstream carrier for further routing and completion.

We **do not** operate as an international gateway provider, do not provide wholesale-only services to other carriers, and are not a high-volume outbound calling platform.

3. Commitment to Legal and Regulatory Compliance

Los Alamos Commnet is committed to:

- Full compliance with FCC rules, including 47 C.F.R. § 64.6300 et seq. and related robocall mitigation requirements;
- Implementing and maintaining a **robocall mitigation program** reasonably designed to prevent the origination of illegal robocall traffic;
- Cooperating promptly and fully with traceback requests from the FCC, the Industry Traceback Group (ITG), our upstream provider, and law enforcement; and
- Taking corrective action, including suspension or termination of customers, where illegal or abusive traffic is identified.

We review and update this program as rules and industry best practices evolve.

4. Customer Vetting and Onboarding (KYC)

Los Alamos Commnet uses a “know your customer” approach appropriate to our size and risk profile:

1. Local Focus:

- We primarily accept customers with a **verifiable local presence** in or around Los Alamos, New Mexico.
- Residential customers must provide valid local addresses and identification as required for service activation.
- Business customers must provide legitimate business information (business name, contact person, address, and tax or registration details where applicable).

2. Prohibited Uses:

Our Terms of Service and Acceptable Use Policy expressly prohibit:

- Illegal robocalls and unlawful telemarketing;

- Use of auto-dialers or campaigns intended to generate high volumes of unsolicited calls;
- Traffic pumping, toll fraud, and other abusive or deceptive practices.

3. Screening of Prospective Voice Customers:

- We do not solicit or accept customers whose primary business model is **outbound telemarketing, lead generation, or mass automated calling**.
- If a prospective customer indicates that outbound calling or contact campaigns are a significant part of their business, we conduct additional review and reserve the right to deny service.

5. Network Architecture and Use of Upstream Providers

Los Alamos Commnet operates local access networks and customer-facing voice infrastructure. For long-distance routing, call termination, and STIR/SHAKEN authentication, we rely on a reputable **upstream carrier**.

Key points:

- We originate and manage SIP trunks and customer registrations on our own equipment.
- Outbound calls are sent to our upstream carrier over secure, authenticated SIP connections.
- We do not manipulate or strip STIR/SHAKEN Identity headers added by our upstream provider.
- We do not offer third-party interconnection or transit services between other unaffiliated providers.

6. STIR/SHAKEN Implementation

Los Alamos Commnet has a STIR/SHAKEN implementation obligation as a voice service provider serving end users. We meet that obligation by relying on **our upstream provider** to perform STIR/SHAKEN call authentication on outbound SIP traffic where technically feasible.

Our practices are:

1. Use of Authenticated Routes:

- We use routes and products from our upstream carrier that include STIR/SHAKEN call signing.
- We do not take actions that would prevent calls from being signed where possible.

2. No Tampering with Identity Headers:

- We do not alter, remove, or tamper with STIR/SHAKEN Identity headers received from our upstream provider.
- We treat any Identity header information as integrity-sensitive signaling.

3. Mitigation for Non-IP / Unsigned Traffic:

- For any traffic that cannot yet be signed or may pass into non-IP networks, we apply the robocall mitigation measures described in this document (KYC, monitoring, and enforcement).

7. Robocall Mitigation Practices

Los Alamos Commnet employs a combination of **customer vetting**, **traffic monitoring**, **DNO blocking**, and **enforcement measures** to mitigate illegal robocalls.

7.1 Traffic Monitoring and Analytics

We monitor call detail records (CDRs) on a regular basis to identify patterns associated with illegal robocalls, including:

- High-volume calling from a single customer or trunk in a short time period;
- Unusually high ratios of very short-duration calls;
- Sequential or near-sequential dialing across wide ranges of destination numbers;
- Sudden, unexpected changes in traffic profile for a particular customer or trunk.

When suspicious patterns are detected, we:

1. Investigate the traffic source and associated customer;
2. Contact the customer, if appropriate, to understand the nature of the traffic;
3. **Rate-limit, suspend, or disable** the trunk or credentials involved while the investigation is conducted; and
4. Terminate service or permanently block traffic where we determine the activity to be unlawful or abusive.

7.2 Do-Not-Originate (DNO) and Caller ID Practices

Los Alamos Commnet enforces reasonable controls on caller ID usage:

- Customers may only use caller ID numbers they **own, control, or are authorized to use**.
- We prohibit use of caller IDs associated with government agencies, financial institutions, or other entities where the customer has no authorization.
- We prohibit use of patently invalid or malformed caller ID numbers.

We are implementing **DNO-based blocking** consistent with FCC requirements by:

- Utilizing DNO capabilities and tools offered by our upstream provider and/or reputable third-party DNO lists; and
- Blocking calls that purport to originate from numbers that should never generate outbound calls (for example, certain inbound-only numbers and invalid number ranges).

7.3 Handling of High-Risk Use Cases

For any customer whose traffic profile appears to be higher risk (e.g., higher outbound volume, use of automated systems), we may:

- Impose stricter rate limits and concurrency caps;
- Require additional written assurances and acknowledgment of our robocall and telemarketing prohibitions;

- Perform more frequent traffic reviews; and
 - Suspend or terminate service if we cannot obtain satisfactory assurances or documentation.
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8. Response to Tracebacks, Complaints, and Notices

Los Alamos Commnet is committed to **responding promptly and cooperatively** to traceback requests and other notices of potential illegal robocalls.

When we receive a traceback request, fraud notice, or complaint:

1. **Immediate Record Search:**

- We search our CDRs and logs to identify the originating customer, trunk, or endpoint associated with the call(s) at issue.

2. **Temporary Controls:**

- If the call appears suspicious or harmful, we promptly **suspend, lock, or rate-limit** the relevant account or trunk while we investigate.

3. **Customer Contact and Investigation:**

- We contact the customer (if identified) to obtain information about the purpose of the calls and any scripts, consents, or records they maintain.
- Where we conclude traffic is unlawful or abusive, we **terminate the customer's ability to place such calls** and may end the customer relationship.

4. **Cooperation with Authorities and Partners:**

- We provide timely responses to the Industry Traceback Group, the FCC, our upstream provider, and law enforcement, consistent with applicable law.
- We document the investigation and the actions taken.

5. **Remediation and Improvement:**

- We evaluate whether the incident identifies any gaps in our mitigation program and adjust our policies, monitoring thresholds, or procedures as needed.

9. Security and Credential Management

To reduce the risk of unauthorized use of our network for illegal robocalls, Los Alamos Commnet maintains reasonable security practices, including:

- Use of strong, unique SIP credentials for trunks and endpoints;
- Limiting exposure of management interfaces and signaling paths to trusted networks;
- Periodic review and rotation of credentials, especially where compromise is suspected;
- Decommissioning of unused accounts, trunks, or legacy systems that no longer meet our security standards.

As part of our ongoing remediation, we are:

- Migrating customer accounts from older legacy servers to newer platforms with improved security and monitoring; and
- Retiring and decommissioning legacy infrastructure that poses elevated risk.

10. Legacy Infrastructure Remediation

Los Alamos Commnet previously used older legacy infrastructure that supported a small number of accounts. As part of our mitigation and compliance efforts:

- We have **locked down or disabled high-risk legacy trunks** associated with anomalous or unexplained traffic;
- We are **migrating the remaining legitimate customers** from those legacy systems to modern, better-secured platforms; and

- We are **decommissioning** legacy servers as migrations are completed to reduce exposure to misconfiguration, credential misuse, or other vulnerabilities.

These steps are intended to ensure that all active customer traffic flows through systems that support our current monitoring, security, and mitigation controls.

11. Governance, Training, and Ongoing Review

Los Alamos Commnet treats robocall mitigation as an ongoing responsibility:

- Overall responsibility for this program lies with the company's leadership (including the Owner/President).
- Key staff involved in provisioning and managing voice services are made aware of our robocall mitigation policies and escalation procedures.
- We periodically review:
 - FCC rule changes and public notices;
 - Guidance from the Industry Traceback Group and industry bodies; and
 - Lessons learned from any incidents or traceback events.

Where appropriate, we update:

- Our internal policies and procedures;
 - Customer Terms of Service and Acceptable Use Policy; and
 - Technical configurations and monitoring thresholds.
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12. Contact Information

Company:

Los Alamos Commnet Inc

d/b/a Los Alamos Network

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End of Robocall Mitigation Program – Los Alamos Commnet Inc