

Crown Point Telephone Corporation Robocall Mitigation Certification and Program

Crown Point Telephone Corporation (Crown Point or Company) submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission's (Commission's or FCC's) rules.

STIR/SHAKEN IMPLEMENTATION

Crown Point is a voice provider without a STIR/SHAKEN obligation. The Company utilizes a non-IP network which cannot support STIR/SHAKEN. Thus, pursuant to §64.6304(d) of the FCC's rules, the Company is under the continuing extension of the STIR/SHAKEN implementation deadline.

Enforcement

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

Crown Point and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

The Company has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

Crown Point commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. The Company will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

Identifying Information

All business names previously used: none

Company is not a foreign voice service provider.

OCN:0085

Affiliates: Crown Point Network Technologies

Subsidiaries: Crown Point Network Technologies, Inc. d/b/a Bridge Point Communication

Individual within company responsible for addressing robocall mitigation-related issues:

Alexandra Towne, Vice President

Executive Department

46 Porter Mill Rd, P.O. Box 275, Crown Point NY 12928

518-597-3300; alexandra.towne@cptelco.net

I, Alexandra Towne, Vice President for Crown Point submits this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.

Alexandra Towne sign

Date 12/20/2024



ROBOCALL MITIGATION PROGRAM

Crown Point has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic.

Crown Point has policies in place designed to detect and prevent fraudulent traffic on its network. Pursuant to FCC requirements, Crown Point blocks calls originating from invalid numbers and calls on the Do Not Originate list. The Company monitors call detail records to look for unusual calling patterns, including excessive minutes of use and other anomalies. Our residential and business customers are only able to place calls originating from their own phone number. New customers requesting an excessive number of call paths are screened for legitimate usage needs.

If there is a reasonable basis to believe that a customer is originating illegal calls, the Company will take action, consistent with our Acceptable Use Policy (AUP) including providing the customer with a warning, suspending or terminating the customer's service, and/or reporting the misconduct to the appropriate authorities. Our AUP includes a provision requiring customers to comply with all applicable laws in connection with the customer's use of our services. Crown Point's customers must agree to abide by the AUP.

Crown Point does not utilize any third-party analytics.

Know-Your-Customer. Our customers are members of the local community in which we operate. Therefore, we know our customers and do not consider our network at high risk of originating illegal robocalls. As part of our standard operating procedures, we conduct due diligence on new and renewing voice customers by collecting personal identifiable information. For business customers, we collect information concerning the company's name, address, physical location, contact

information, and Federal Tax ID, where appropriate. With respect to residential customers, we verify customers' name and address, and physical service location.

Know-Your-Upstream Provider. The Company knows all the carriers from which it receives traffic. The Company has confirmed that all connected providers are listed in the Robocall Mitigation Database. The Company will share call authentication data with connected service providers.

Traceback. The Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.