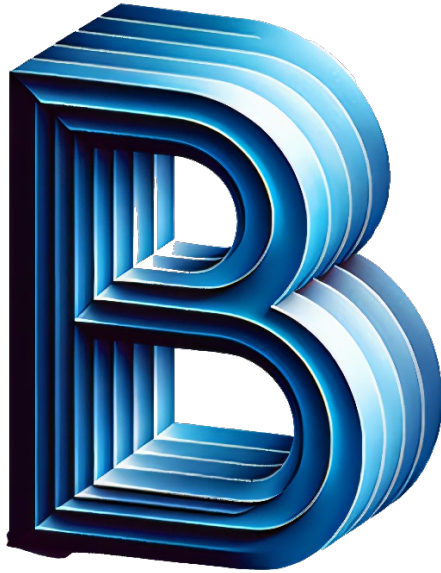




Bridger Systems LLC

Robodialing Mitigation Strategy

V1 02/10/2024, V1.1 December 10, 2024,
V1.2 05.30.2025

Robocall Mitigation Plan

Bridger Systems, LLC

FCC Filing Date: 12/10/2024

1. Contact Information

- **Company Name:** Bridger Systems, LLC
 - **FCC Registration Number (FRN):** 0032941718
 - **OCN:** 706K
 - **Primary Contact Name:** Joshua Williamson
 - **Contact Email Address:** Joshua@bridger.systems
 - **Contact Phone Number:** +1 (713) 766-8001
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2. Description of the Voice Services Offered

- **Type of Services:** VoIP calling services via SIP protocol to clients with VoIP-enabled PBX systems or FXS/PRI gateways to provide compliant solutions for VoIP and Legacy PBX, facilitated through upstream 3rd parties, which are sold through partner agreements.
- **Customer Base:** Primarily 501(c)(3) organizations, educational institutions (EDU), and small- to medium-sized businesses (SMBs). We have less than 50 subscribers currently. Our services currently are only offered to clients we manage their voice and network infrastructure.
- **Geographic Coverage:** Nationwide, with customers located in Texas, North Carolina, Pennsylvania, and Arkansas.

3. Know Your Customer

We offer carrier services which are sold through upstream partners for clients who we manage as part of a contracted service for voice and network infrastructure. We offer this as part of a comprehensive solution which enables the client to have a single point of contact.

- **Verification of Customers:** All clients undergo manual business verification during onboarding, including submission of business filings in their respective states, Tax exemption documentation or sales use certificates. We verify this information with the state the client is doing business or has established nexus. At a minimum they will be required to be a registered business entity, their service location must match their address on file, and

they are permitted only to use the telephone numbers provisioned on their account which is easier for us to enforce when considering we manage the PBX or their calling solutions.

- **Contractual Obligations:** All customers accept our Master Services Agreement which includes verbiage that they contractually agree to which has penalties that could see their services being disrupted if they perform a violation of the terms of the agreement. There are several key pieces which are directly related.
 - We do not allow dialer traffic on our network.
 - We do not pass calls listed in the DNO or DNC databases.
 - All Calls must include all necessary header values to meet compliance for STIR/SHAKEN, TRACED ACT, Kari's Law, Ray Baums Act, Suicide Prevention Act, and other federally mandated requirements not directly related.
 - **Fixed Channels:** Our clients pay for fixed channel allotments based on need. The overwhelming majority of our clients have a fixed call path of 10 or less channels for calling with our largest being 50.
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4. Overview of Robocall Mitigation Practices

- **Call Practices:** Bridger Systems, LLC has been STIR/SHAKEN compliant since its network inception in 2022. All calls originating or terminating from/to end users that enter our voice network are subject to the following measures.
 - **Capture Cards:** We employ 10Gb Transparent capture cards at all Datacenter edges from either Viavi or Napatech which includes software to parse and hold for any traffic type we capture. This allows deep inspection, packet replay and behavior-based alerting and policy. We regularly review and verify this solution is online and reports are generated daily for statistical and reference information, and real-time notifications are sent to our internal team for active threats or potential problems. Currently we capture all SIP headers which include any header value of 3XX, 4XX, 5XX or 6XX. We have not had to use this for TRACED requests, but we do use the solution every day in order to mitigate security threats and tweak our signature-based security solution, so we are certain it is working. Additionally, we regularly sample traffic for required data collection as part of our data center maintenance and management policies.
 - **Beyond MPOE:** Our carrier clients are also support clients, so we manage the PBX, the network and other aspects of their communications infrastructure. With this level of access and oversight over the infrastructure we are responsible in most cases for setting up the SIP trunk, caller ID and other aspects of the voice infrastructure which makes it very easy for us to ensure our clients are compliant with their calling, and that they do not use techniques which would allow them to evade our processes and tools which are highly effective. This is something that is unique to our operation due to the relationship.

- **We have a fully implemented STIR/SHAKEN implementation. We are registered with the STI-AG, authorized to sign and verify calls, and our Oracle SBC allows a certificate which is used to sign and validate calls against the main repository. Our Certificate is issued by Telonium Communications,**
- **DNO/DNC:** We also leverage the capabilities of our session border controller to fire jobs in parallel with call setups. All calls entering our voice network will fire a parallel API call and check the call against DNC/DNO databases. We do store the response in cache for 24hrs to expedite subsequent calls. After 24 hours it will check again.
- **Traffic Monitoring and Analysis:**
 - Our session border controllers allow us to have real time visibility and generate alerts on demand and on incidents. We pipe the syslog data in near real time to our NOC dashboard which is actively monitored 24 hours a day.
 - We have in house developed tool kits which allow us to generate “Profiles” which are behavior based and are used to detect unusual, anomalous, or prohibited calling patterns.
 - Clear IP Dashboard and reporting as well as the Martini Security dashboard.
 - Our session border controllers allow for action based alerts and we receive daily reports which includes 911 calls, blocked/rejected/anomalous calls among others not related to this scope.
 - We have the capability to perform packet replay which allows rich insight to review a suspect call or behavior in high level detail.

6. Commitment to Compliance

- **STIR/SHAKEN Certification:** Bridger Systems has been STIR/SHAKEN compliant since its first call and remains committed to maintaining compliance.
- **Policy Updates:** Policies are reviewed every 90 days to ensure alignment with current standards and regulatory requirements. Immediate steps are taken upon receiving actionable changes from upstream providers.
- **Traceback Requests:** While we have not received a traceback request. We are committed to providing all necessary resources and cooperation to satisfy any in the event that they were to occur.
- **Collaboration with Regulatory Authorities:** Bridger Systems is fully committed to cooperating with the FCC and other regulatory bodies, and we believe that we have a way to actually stop robo dialing entirely using the technologies employed today and can be managed by the STIR/SHAKEN framework. We would look forward to collaborating to end fraudulent calling, and we believe we have a pragmatic and practical way to achieve it.

We believe that all of these components ensure that our small voice network is an example of excellence and commitment to quality. We are committed to remaining compliant and continuing to lead by example. Thank you and we look forward to collaborating with you to end robocalling.

Sincerely,

A handwritten signature in black ink, appearing to be the initials 'JW' with a stylized, cursive flourish.

12/10/2024

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