



Robocall Mitigation Plan

1. Provider Information

- **Company Name:** High Country Networks
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2. Overview

High Country Networks recognizes the importance of preventing unlawful robocalls originating on its network to comply with 47 CFR § 64.6301(a)(1) and (2). This plan outlines our strategies to mitigate illegal robocalls and demonstrates our commitment to protecting consumers from unwanted and fraudulent calls.

3. Policies and Procedures to Identify and Mitigate Robocalls

A. Traffic Monitoring and Analysis

1. Automated Monitoring:

- Implement tools to monitor voice traffic for patterns consistent with robocalls.
- Identify high call volumes, short-duration calls, or anomalous calling patterns.
- Currently our PBX does not allow for any high call volumes and any such activity would be barred in the system.

2. Call Analytics:

- Analyze call origination and verify compliance with STIR/SHAKEN standards (where applicable).

3. Thresholds for Investigation:

- Calls exceeding certain thresholds (e.g., over 100 calls per minute or calls lasting less than 5 seconds) will trigger further investigation.
- Investigate that leads to confirmation of Robocalling will be cause for immediate removal, blocking and processing within our system.

B. Call Originating Policies

1. Knowing Our Customers Policy:

- Vet all customers before granting service.
- Verify business customers' identity, legitimacy, and use of numbers to ensure compliance with FCC rules.
- Periodically audit existing customers to ensure compliance.

2. Call Authentication:

- Implement STIR/SHAKEN technology for IP-based traffic to verify caller identity (if not exempt).



3. Network Access Controls:

- Restrict access to the network for customers who fail to comply with applicable laws and policies.
- Enforce contractual obligations prohibiting unlawful robocall generation.

C. Handling of Suspected Robocall Traffic

1. Identification and Investigation:

- Immediately investigate flagged traffic using analytics tools and “Knowing Our Customer” information.
- Document findings and take corrective action.

2. Blocking or Mitigating Calls:

- Block clearly unlawful calls in compliance with FCC rules.
- Notify customers of call blocking when required and provide a method to dispute erroneous blocks.

3. Repeat Offenders:

- Terminate services to customers repeatedly identified as originating illegal robocalls.

4. Compliance with STIR/SHAKEN (Where Applicable)

High Country Networks complies with STIR/SHAKEN implementation requirements for IP-based calls. Where STIR/SHAKEN cannot be applied (e.g., non-IP networks), we implement robocall mitigation strategies to ensure compliance under 47 CFR § 64.6301(a)(1).

5. Reporting and Recordkeeping

1. Robocall Mitigation Database:

- Submit this Robocall Mitigation Plan to the FCC’s Robocall Mitigation Database.
- Update the plan as necessary to reflect changes in processes or technology.

2. Records Retention:

- Maintain records of:
 - Traffic analytics and investigations.
 - Customer vetting procedures.
 - Actions taken to mitigate unlawful robocalls.

3. Annual Reviews:

- Conduct internal audits to ensure continued compliance with this plan.

6. Customer and Partner Education

1. Inform Customers:

- Educate customers about the dangers of illegal robocalling and their role in compliance.



- Provide customers with resources to identify and report unlawful robocalls.
- 2. Coordination with Partners:**
 - Work with upstream and downstream carriers to share information about unlawful robocall sources.
 - Participate in industry forums to improve mitigation practices.

7. Enforcement

Non-compliance with our robocall mitigation policies may result in:

- Suspension or termination of services for violators.
- Reporting unlawful activity to the FCC or relevant law enforcement agencies.

8. Conclusion

This Robocall Mitigation Plan demonstrates [Your Company Name]’s compliance with FCC regulations under 47 CFR § 64.6301(a)(1) and (2) and outlines our commitment to proactively prevent unlawful robocall traffic on our network.

Authorized Signatory: _____

Date: 12/17/2024