

BW TELCOM LONG DISTANCE, INC.

BW Telcom Long Distance, Inc. (“BW Telcom”) is a long distance carrier that provides resold long distance services to customers of its local service affiliates in rural Nebraska.¹ Inteliquent, Inc. (“Inteliquent”) is the wholesale provider for BW Telcom’s resold long distance services. BW Telcom carries traffic that traverses the public switched telephone network, but it neither originates nor terminates that traffic. As such, BW Telcom is an intermediate provider pursuant to Federal Communications Commission (“FCC”) rule section 47 C.F.R. §64.6300(g). More specifically, BW Telcom is a non-gateway intermediate provider pursuant to new FCC rule section 47 C.F.R. §64.6300(i), which became effective on August 21, 2023.

BW Telcom has contracted with Inteliquent and Sinch America Inc. (“Sinch”) to use their STIR/SHAKEN products and services for all originating long distance traffic that is delivered to the Inteliquent tandem. BW Telcom made these products and services operational in June 2023, well before the December 31, 2023 deadline by which a non-gateway intermediate provider “must ... authenticate caller identification information for all calls it receives directly from an originating provider and for which the caller identification information has not been authenticated and which it will exchange with another provider as a SIP call” pursuant to new FCC rule section 47 C.F.R. §64.6302(d), which became effective on August 21, 2023.

All long distance voice calls made by BW Telcom customers originate on the TDM network of BW Telcom’s local service provider affiliates. The TDM calls are converted to Internet Protocol (“IP”) in the intra-exchange network infrastructure and remain on IP facilities to the Inteliquent/Sinch switch, where Inteliquent and Sinch will authenticate the BW Telcom customer calls even though originated on TDM network. Should BW Telcom ever receive SIP originated calls from an originating service provider, BW Telcom will be capable of authenticating any SIP originated calls received that are not already authenticated. BW Telcom relies on the STIR/SHAKEN processes and procedures implemented by Inteliquent, as well as the certification of STIR/SHAKEN compliance filed by Inteliquent in the Robocall Mitigation Database (“RMD”).

ROBOCALL MITIGATION PLAN

Know Your Customer

BW Telcom only provides long distance services to customers of its local service provider affiliates, Benkelman, Hartman, and Wauneta. As such, all BW Telcom customers (business or residential) are subject to the policies Benkelman, Hartman, and Wauneta with regard to the requirement to complete and sign an application for local and long distance service. During the application process, the local service provider enquires about whether the customer will be a high-volume user. If the customer verifies that they are not going to be a high-volume user, the local service provider completes the application. If the customer indicates that they will or potentially could be a high-volume user, the local service provider makes sure they understand that their service may be terminated if it is determined that the service is being used or abused in

¹ BW Telcom is the long distance provider affiliated with Benkelman Telephone Company, Inc. (“Benkelman”), Hartman Telephone Exchanges, Inc. (“Hartman”), and Wauneta Telephone Company (“Wauneta”).

any manner deemed as illegal activity by the FCC. The applications of the local service provider affiliates include a statement to that effect. In general, the tariffs of BW Telecom's local service provider affiliates and the terms of service provided by BW Telecom prohibit unlawful or fraudulent use of BW Telecom's services, as well as the services of the local service provider affiliate, specifying that BW Telecom and its local service affiliate may refuse the installation of or continuation of service if the customer plans to or uses the service in an unlawful way. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues then we terminate their service.

Physical verification is mandatory for all new residential and business installations at the time the potential customer applies for local and long distance service. The local service provider also requires that the customer provide a valid driver's license or other valid identifying documentation for all authorized parties licensed on each account for verification, which driver's licenses or other valid identifying documentation are photocopied. The local service provider also requires Federal identification numbers and State of Incorporation documents for new business service installations.

Call Blocking

Any local service customers of Benkelman, Hartman, and Wauneta that have selected BW Telecom for long distance service have the option to sign up for a free service called Selective Call Blocking. All customers may sign up for this service at any point in time. BW Telecom does not use any third party analytics for blocking calls.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers. BW Telecom only receives voice traffic from its three local service provider affiliates, Benkelman, Hartman, and Wauneta.

We confirm that the three upstream providers from which BW Telecom receives voice traffic have certifications in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. We require that our upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and that they have appropriate means to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, identifying whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us any traffic that is illegal. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Process for Robocall Mitigation

When voice calls are initiated on the Benkelman, Hartman, and Wauneta networks, including long distance calls destined for the BW Telcom network, the networks' switch pushes files to an ftp site twice a day for review by RVW, Inc. ("RVW"), a telecommunications data services company, to monitor all outbound voice traffic for origination and transit of illegal robocalls. RVW downloads the files each business day. On weekends and holidays, files are processed on the next business day.

Each business day RVW converts the switch files into a standardized RVW LAMA format. During the conversion, call patterns are monitored and suspicious call patterns are identified. These will be originating calls from a single telephone number which exceed established thresholds based on prior usage. RVW can then run additional analysis on the data and produce detailed reports, which include the originating and terminating numbers along with call times and call duration. These detailed reports are then forwarded to the General Manager for further investigation. These detailed reports are then forwarded to the General Manager and CO Manager of the appropriate local service provider affiliate for further investigation.

The local service provider affiliate immediately investigates any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. If the local service provider affiliate determines that the traffic was likely unlawful, then it provides a warning to stop sending such traffic. If such traffic continues, then the local service provider affiliate terminates the service at issue.

RVW realizes that at times, schools, civil defense, and other organizations may make mass callings that we are not aware of. This calling would also be forwarded to the General Manager and CO Manager of the local service provider affiliate for further investigation.

Long distance calls carried on the BW Telcom network are routed over IP facilities to the Inteliquent switch, where they are authenticated by Inteliquent and Sinch. For long distance calls carried by Inteliquent, BW Telcom also relies on Inteliquent's Robocall Mitigation Program to monitor, evaluate, and address suspicious call patterns in an effort to avoid originating illegal robocall traffic. BW Telcom attaches here the Inteliquent Robocall Mitigation Plan on file in the Robocall Mitigation Database.

Traceback

BW Telcom will respond within 24 hours to all traceback requests, and will cooperate with the Federal Communications Commission, law enforcement, and the industry traceback consortium. We will cooperate fully with such entities in investigation of and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.