



East Central Vermont Telecommunications District (“ECFiber”) is a Communications Union District (CUD), which is a special-purpose municipality organized pursuant to Chapter 82 of Title 30 of the Vermont Statutes Annotated originally comprised of 23 towns. In addition to Internet, ECFiber also offers its customers Voice Over Internet Protocol (VoIP) services as a reseller of white-labeled services offered by Biddeford Internet Corporation dba GWI (“GWI”) and Alianza, LLC (“Alianza”). ECFiber does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, ECFiber does not have the facilities necessary to implement STIR/SHAKEN. ECFiber has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

ECFiber follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of ECFiber’s customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

ECFiber’s services are targeted to small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using ECFiber’s services agree to abide by the rules and regulations set forth in our [Subscriber Agreement and Terms of Service](#). ECFiber prohibits customers/subscribers from engaging in illegal activity, creating a false Caller ID (i.e., spoofing) or robocalling. Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

III. TRACEBACK

ECFiber commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, ECFiber will cooperate with such entities’ investigation.

IV. ROBOCALL MITIGATION

ECFiber's underlying voice providers, GWI and Alianza have committed to fully complying with Commission's robocall blocking requirements. GWI utilizes software provided by TransNexus to monitor outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and GWI will alert ECFiber if an ECFiber customer originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Both ECFiber and GWI will immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If either entity determines that the caller was attempting to originate unlawful robocalls, then we will either warn them to stop or terminate their service, as appropriate.

ECFiber's other underlying provider, Alianza, has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. As part of this process, Alianza would notify ECFiber of potentially fraudulent activity occurring in any of Alianza's subscriber accounts. Detailed information about this fraud detection and mitigation process is provided to ECFiber through Alianza's knowledge base and support resources. Alianza does not use a third-party vendor for call analytics or blocked. Alianza complies with the FCC's requirement to maintain and enforce a Do Not Originate (DNO) list designed to block calls from numbers that should not place outbound calls.

V. KNOW YOUR UPSTREAM PROVIDER

ECFiber has agreements in place with GWI and Alianza to resell their VoIP offering to ECFiber's customers. ECFiber has confirmed both underlying providers are listed in the Robocall Mitigation Database.

VI. PLAN UPDATES

ECFiber will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.