

ROBOCALL MITIGATION PLAN

This document describes the steps that Youngsville Television Corporation dba Blue Fiber (“Blue Fiber”) is taking to meet the revised Robocall Mitigation Database filing requirements and related rules adopted in the Federal Communications Commission’s (“FCC”) *Sixth Caller ID Authentication Report and Order*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (rel. Mar. 17, 2023).

Pursuant to 47 CFR § 64.6305, this Robocall Mitigation Plan describes the specific steps we are taking to avoid the origination, carrying, or processing of illegal robocall traffic. We will periodically evaluate the risks we face, the effectiveness of our policies and procedures, and our capabilities to support the measures described. Should we determine that changes are appropriate, we may alter our practices from those described below. We may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in our business, capabilities and needs.

I. Filer Information

Blue Fiber is a small cable operator in Pennsylvania. We are currently deploying infrastructure to offer voice and broadband services to customers within our service territory in western Pennsylvania and have launched the commercial offering of voice service in specific areas.

II. STIR/SHAKEN Certification

Pursuant to 47 CFR § 64.6304(b), Blue Fiber is exempt from the FCC’s caller ID authentication requirements because it lacks control over the network infrastructure necessary to implement STIR/SHAKEN. Blue Fiber hereby certifies that it is a voice provider not subject to a STIR/SHAKEN implementation obligation.

We provide voice service to our end-user customers by reselling voice service provisioned over the Zito wholesale voice platform. Zito West Holding, LLC dba Treasure Lake, L.P. and Zito Media Voice, LLC (“Zito”) has certified in the FCC’s Robocall Mitigation Database that it has implemented STIR/SHAKEN.

III. Know-Your-Upstream Providers Procedures

Blue Fiber incorporates by reference the measures implemented by Zito to know its upstream providers.

IV. Know-Your-Customer Procedures

The vast majority of our end user customers are either residential or single-party business lines. These customers are limited to one call path, thereby minimizing the overall risk of robocalls originating from our customers. We have not received information suggesting that robocalls are likely to originate on our network. Therefore, we do not consider our network at high risk of originating illegal robocalls.

As a locally-based company, we know our customers – our customers are members of the local community we operate in.

As part of our standard operating procedure, we will be conducting due diligence on new and renewing voice customers, confirming the customer's identity and whether it is a business. For business customers, we will confirm:

- Contact person
- Physical business location
- State incorporation
- Federal tax ID
- Nature of the business

V. Contractual Terms and Other Measures

We have in place an enforceable terms of service/acceptable use policy that prohibits our customers from engaging in robocalling.

If we have a reasonable basis to believe that a customer is originating illegal robocalls, we will require the customer to remedy the problem and, if effective action is not taken, we can suspend and/or terminate service to the customer.

Our customers are not allowed to self-provision voice services using their broadband connection. We only sell voice services to physical locations that are on our network. The provisioning information connecting our voice customers to the PSTN via VoIP is provisioned directly by the service provider and cannot be moved or altered by an end user customer.

VI. Fraud Detection and Analytics

Our wholesale voice provider, Zito, has tools that can create reports and alerts that can help identify outbound call volume by customer that can help identify possible robocalling activity.

VII. Enforcement

We commit to respond to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use our service to carry or process calls.

We have designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. We will provide the Industry Traceback Group (ITG) with the contact information and business hours for those individuals upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>

If a pattern of questionable activity is detected, we will require our customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

VIII. Cooperation with State and Federal Regulators

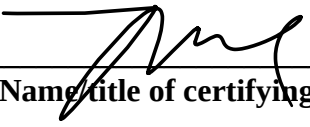
We will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, we will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

IX. Additional Certifications

We hereby certify that we have not been prohibited from filing in the Robocall Mitigation Database.

In the prior two years, we have not been subject to an FCC, law enforcement or regulatory agency action or investigation due to alleged robocalling, or spoofing.


_____**Troy M Clawson - YTV Board President**
[Name/title of certifying official]

____**9/12/2025**_____
[date]