

Comanche County Telecommunications, LP dba Comanche County Long Distance Robocall Mitigation Program

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps Comanche County Telecommunications, LP dba Comanche County Long Distance has taken to avoid originating illegal robocall traffic.

- Comanche County Telecommunications, LP dba Comanche County Long Distance has a “know your customer policy” to prevent your services from being used to originate illegal traffic. We extensively investigate potential business customers seeking access to high-volume origination services prior to providing service by collecting information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.
- Comanche County Telecommunications, LP dba Comanche County Long Distance requires all business customers to sign contracts that contain provisions that allow for termination in the event high-volume origination services are abused by new and renewing customers. Comanche County Telecommunications, LP dba Comanche County Long Distance will not hesitate to enforce them if necessary.
- Comanche County Telecommunications, LP dba Comanche County Long Distance exercises due diligence before accepting traffic from an upstream provider by collecting said provider’s physical business location, contact person(s), and nature of their business. All contracts with upstream providers contain provisions that allow for termination of access in the event of a high volume of illegal traffic.
- While not using direct analytics software, Comanche County Telecommunications, LP dba Comanche County Long Distance staff frequently monitor switched traffic volume and logs for abnormal patterns. All upstream providers that Comanche County Telecommunications, LP dba Comanche County Long Distance interconnects, monitor traffic with automated systems and will notify Comanche County Telecommunications, LP dba Comanche County Long Distance of any and all high volume, illegal activity.
- Comanche County Telecommunications, LP dba Comanche County Long Distance commits to respond fully, 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 illegal robocallers that use its service to originate, carry or process illegal robocalls.