

Robocall Mitigation Plan

Business Information

3E8 Broadband Solutions, LLC d/b/a empower Delivered by CECC
4314 Stadium Blvd,
Jonesboro, AR 72404

Contact Information

Michael Privett
Manager of Network Operations
870.336.0999
MPrivett@empowerbroadband.com

Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

3E8 Broadband Solutions, LLC d/b/a empower Delivered by CECC ("3E8") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. 3E8 is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, 3E8 was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as 3E8 now file RMPs. This document delineates 3E8's RMP. Because 3E8 does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, 3E8 works closely with its upstream provider to carry out the required mitigation functions.

Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a

business relationship with 3E8 in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

3E8's KYC program involves obtaining specific information when a subscriber signs up for service. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, 3E8 provides the following information concerning its upstream voice service carrier:

Alianza Inc.
1064 S. North County Blvd.
Ste. 500
Michelle Andrews
801-701-1658
michelle.andrews@alianza.com

To the extent that 3E8 were to receive information from law enforcement or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. While 3E8's agreement with its upstream provider contains no provisions specific to robocall mitigation, 3E8 has received assurances from them that they have, and will continue to, sign calls transmitted to 3E8, and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to you.

Acceptable Use Policy ("AUP")

3E8 maintains an AUP that subscribers must agree to before being permitted to use 3E8's network. Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using 3E8's service to engage in or in connection with fraudulent activities.

3E8's contractual terms with subscribers specify that 3E8 may suspend or terminate service for violation of the AUP.

Mitigation During Service

3E8 works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual

numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

3E8 works with its upstream provider to identify behaviors which indicate illegal call activity.

Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, 3E8 works with its upstream provider to follow defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Because 3E8 does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in 3E8's analytics.

3E8 follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, 3E8 will devote sufficient resources to provide prompt and complete resources to traceback requests.

3E8 works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to 3E8 by subscribers or third parties. The investigation could potentially result in opening a traceback request or with 3E8 contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated 3E8 contracts governing the transport of voice calls, 3E8 will endeavor to contractually require 3E8's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

3E8 will implement Do Not Originate requests it receives from the ITG. 3E8's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If 3E8 and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, 3E8 will take appropriate action which may include suspending or terminating the subscriber's use of 3E8's service. 3E8 will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. 3E8 will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, 3E8 will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

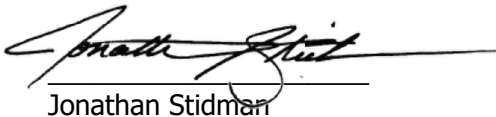
Certification of Jonathan Stidman

I, Jonathan Stidman, Business & Regulatory Analyst of 3E8 Broadband Solutions, LLC d/b/a empower Delivered by CECC ("3E8"), do hereby certify, under penalty of perjury, the following:

- a. 3E8, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- b. 3E8's Business name and primary address are as follows:

3E8 Broadband Solutions, LLC d/b/a empower Delivered by CECC
4314 Stadium Blvd,
Jonesboro, AR 72404

- c. Other than those listed above, 3E8 has no other business names in use.
- d. 3E8 has not previously used any other business name.
- e. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- f. 3E8's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- g. 3E8 is wholly owned by Craighead Electric Cooperative Corporation. 3E8 is a subsidiary of that company.
- h. 3E8 has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. 3E8 is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. 3E8 is not required to, and does not have, an operating company number.



Jonathan Stidman

2/16/2026