

Robocall Mitigation Plan

Business Information

JEC Broadband LLC
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Contact Information

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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, outlines "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

JEC Broadband LLC ("JEC") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. Because JEC lacks control of the infrastructure necessary to implement STIR/SHAKEN, it is not required to be STIR/SHAKEN compliant. In compliance with the R&O, JEC submits this RMP and certification.

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 JEC in which it transmit, originate, and/or terminate calls based on behalf of the subscriber.

JEC's KYC confirms a subscriber's identity by vetting a subscriber directly. JEC's voice customers are all broadband subscribers, which are vetted by collecting such information such as:

- physical location;

- contact person(s); and
- place of subscriber's primary use of JEC's service;

When new subscribers provide the above information, they are contacted by JEC's sales team to confirm the information provided. All Caller IDs are set by JEC, and the subscriber does not have direct access to change its caller ID; that must be approved by JEC.

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, JEC provides the following information concerning its upstream voice service carrier.

JEC's upstream provider is:

Alianza
1064 S. North County Blvd.
Pleasant Grove, UT 84062
Robb Sigman
robb.sigman@alianza.com
(385) 233-0177

JEC has no contractual provisions with its upstream carrier concerning robocall mitigation, but JEC and its upstream provider work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests. Moreover, Alianza is listed as fully STIR/SHAKEN compliant in the FCC's Robocall Mitigation Database. Alianza addresses STIR/SHAKEN compliance here: <https://support.alianza.com/hc/en-us/articles/360045910614-STIR-SHAKEN>.

Acceptable Use Policy ("AUP")

JEC maintains an AUP that subscribers must accept before being permitted to use JEC's service. See <https://myjec.net/index.php/acceptable-use-policy/>.

Analytics for Monitoring Traffic

JEC works with its upstream carrier to analyze high-volume voice traffic to identify and monitor patterns consistent with robocalls. The upstream carrier's system alerts it to calling patterns with unusual spikes, traffic patterns, and related matters.

If a calling pattern is detected that is consistent with illegal robocalls, JEC and its upstream provider will identify the party that is using its network to transmit those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

No third-party vendors are involved in deploying JEC's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, JEC is alerted by its upstream carrier, and follows 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; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

JEC follows the Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations.

Blocking

JEC works with its upstream carrier to abide any Do Not Originate requests it receives from the ITG or other authorities. JEC will cooperate with Investigative Bodies (provide a single point of contact) to address traceback requests from law enforcement and regulatory entities such as state attorneys general, the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

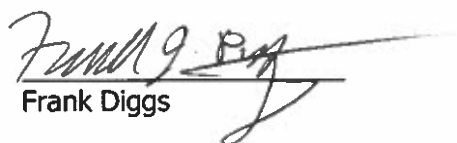
This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. JEC will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

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

Certification of Frank Diggs

I, Frank Diggs, Manager, Analytics & Member Engagement of JEC Broadband LLC ("JEC") do hereby certify, under penalty of perjury, the following:

- a. JEC is not required to implement STIR/SHAKEN, due to its lack of control over the necessary infrastructure.
- b. JEC's business name and primary address are as follows:
- c. The business names JEC has in use are MyJEC.NET and MyJECVoice.
- d. JEC 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. JEC is a wholly owned subsidiary of Jackson Electric Cooperative, Inc., which is a member-owned electric cooperative. The Board of Directors for Jackson Electric Cooperative, Inc. is composed of the following individuals: William Orton, Herf Corneilus, Michael Jacobs, William Hansen, Bruce Elliot, Anthony Smith, Laval Simons, Doug Tise, Tom Hudgins, James Roach & Patrick Stuart.
- g. JEC's role in the call chain is that of a voice service provider with no STIR/SHAKEN implementation obligations.
- h. JEC is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. JEC has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. JEC is not required to, and does not have, an Operator Code Number.


Frank Diggs