

Mountain View Telephone Company (CLEC)

FRN: 0030291793

Robocall Mitigation Plan

Filing Date: February 15, 2024

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps MOUNTAIN VIEW TELEPHONE COMPANY (CLEC) has taken to avoid originating illegal robocall traffic. A Robocall is an unsolicited call from an auto-dialer that delivers a prerecorded voice message.

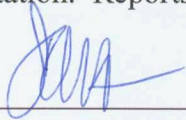
- 1) Know our customers
 - a) MOUNTAIN VIEW TELEPHONE COMPANY (CLEC) has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. MOUNTAIN VIEW TELEPHONE COMPANY (CLEC) thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services. In addition, MOUNTAIN VIEW TELEPHONE COMPANY (CLEC) will extensively investigate any new customers that seek access to high-volume origination services, to ensure that they are not abused by bad actors.
- 2) Call analytics to identify and block illegal robocall traffic
 - a) Call blocking and filtering analytics from the TNS Call Guardian product are utilized to protect subscribers from unwanted calls, whether they be robocalls, spam, nuisance, fraudulent calls, political campaigns, charities, telemarketers, etc.
- 3) Know our upstream providers
 - a) MOUNTAIN VIEW TELEPHONE COMPANY (CLEC) exercises due diligence before accepting traffic from an upstream provider. Specifically, we collect information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.
- 4) Stir/Shaken
 - a) As of this filing, MOUNTAIN VIEW TELEPHONE COMPANY (CLEC) has implemented STIR/SHAKEN on its IP network, and has been authenticating or verifying caller ID information for originating and terminating SIP calls.

5) Commitment to traceback requests

- a) MOUNTAIN VIEW TELEPHONE COMPANY (CLEC) 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 services to originate, carry, or process illegal robocalls.

6) Monitoring

- a) We have access to a cloud based monitoring system that records TN reputation. Reports are available on a per TN basis or company as a whole.



Sara Zimmerman, President
MOUNTAIN VIEW TELEPHONE COMPANY