

Hamilton Relay Robocall Mitigation Program

This Robocall Mitigation Plan (RMP) is submitted by Hamilton Relay, Inc. (Hamilton Relay) pursuant to the provisions of 47 C.F.R. § 64.6305. Hamilton Relay is a provider of Telecommunications Relay Services (TRS) for individuals with hearing and speech disabilities, a specialized communications service. Hamilton Relay joins the FCC and others in the ecosystem in combatting unlawful robocalls and submits its RMP to Robocall Mitigation Database out of an abundance of caution.

This document explains the type of services that Hamilton Relay offers and the status of Hamilton Relay's caller ID authentication implementation for each service, sets forth Hamilton Relay's current policies and procedures that are reasonably designed to avoid carrying or processing of illegal robocall traffic on its network, and confirms Hamilton Relay's commitment to respond to all traceback requests as required by the FCC's rules.

Caller ID Authentication Implementation

Hamilton Relay provides limited types of TRS, namely: TTY TRS, speech-to-speech services, non-IP captioned telephone service (collectively, these forms of TRS are referred to as "PSTN TRS"), and IP-based Captioned Telephone Service (IP CTS). Hamilton Relay's role in the call is different for each service it offers, but in all cases is quite limited because the underlying carrier is principally in control of call networking.

- **PSTN (TRS)**: Hamilton Relay offers PSTN TRS, which allows persons with hearing or speech disabilities to place and receive telephone calls and is a PSTN-based service. Using specialized telephone equipment (e.g., TTY), individuals can communicate with standard telephone users through the use of specially trained Communication Assistants (CAs) who facilitate the calls. Users obtain their telephone service from another voice service provider, such as their local phone company. Hamilton Relay essentially sits in the middle of a call – between the originator and the called party – and, therefore, at most may be considered to be a non-gateway intermediate provider for the purposes of the FCC's caller ID authentication rules.
- **Internet Protocol Captioned Telephone Service (IP CTS)**: Hamilton Relay is a certified provider of IP CTS. IP CTS is used by persons with hearing loss who can speak and have some residual hearing. IP CTS allows the user to simultaneously listen to the other party and read the captions of what the other party in a telephone conversation is saying. IP CTS uses the Internet – rather than the telephone network – to provide the link and captions between the IP CTS user and the IP CTS service provider. Automated speech recognition technology, with or without the assistance of a CA, transcribes the non-IP CTS user's words into captions for the IP CTS user to read. IP CTS can be used with a captioned telephone or an existing voice telephone and a computer or other Web-enabled device without requiring any specialized equipment. Hamilton Relay does not provide the voice service for its IP CTS services. Rather, the voice service is provided by a voice service provider – either the customer's existing telephone service provider, or for a subset of our customers, a VoIP telephone service provider. In the latter case, the VoIP telephone service is integrated into the IP CTS offering.

To the extent that any STIR/SHAKEN obligations are applicable to Hamilton Relay, we provide below the status of its STIR/SHAKEN implementation for each service.

- **PSTN TRS**: Hamilton Relay has not implemented STIR/SHAKEN at this time and it is not currently obligated to do so. Hamilton Relay is subject to an ongoing extension under 47 C.F.R. § 64.6304(b) because it is not able to obtain a Service Provider Code (SPC) token. The STI-Governance Authority

requires that to obtain a token, providers must: (1) have a current form 499A on file with the FCC, (2) have been assigned an Operating Company Number (OCN), and (3) have certified with the FCC that they have implemented STIR/SHAKEN or comply with the Robocall Mitigation Program requirements that are listed in the FCC Robocall Mitigation Database. Because Hamilton Relay collects no revenue from end users, and instead is compensated from the interstate TRS Fund, Hamilton Relay is not required to have a Form 499A on file with the FCC, nor does it have an OCN. Accordingly, Hamilton Relay has an ongoing extension from the obligation to implement STIR/SHAKEN at this time. Separately, Hamilton Relay also has an extension under 47 C.F.R. § 64.6304(d), which exempts providers from implementing STIR/SHAKEN on those portions of their network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. When Hamilton Relay receives a PSTN TRS call, the calls arrive via toll free numbers which primarily traverse through TDM switches. The call must be ingested into the Hamilton TDM Switch, meaning the call is converted to TDM and any caller ID authentication information is stripped out. Hamilton Relay continues to pass through the caller ID information from the originating call to the outbound call as required by TRS rules. However, the attestation information contained in a SIP header is not able to be passed through to the outbound call.

- **IP CTS:** As noted above, Hamilton Relay does not provide voice service as part of its IP CTS service. Rather, the voice service is provided by a voice service provider. These voice service providers are the entities responsible for STIR/SHAKEN implementation and robocall mitigation with respect to that user. For the subset of users that rely on the integrated VoIP service with IP CTS, the VoIP provider is responsible for ensuring compliance with the FCC's caller ID authentication rules. Nevertheless, Hamilton supports the FCC's efforts to reduce and eliminate unlawful robocalls and will participate in such efforts to the extent it is capable of doing so from a network perspective.

Robocall Mitigation Practices

Because of the nature of Hamilton Relay's TRS role, the incidence of illegal robocalls being carried over its network is small. Nevertheless, Hamilton Relay shares the FCC's desire to end the scourge of illegal robocalls and takes the following "reasonable steps" to mitigate illegal robocall traffic on its network.

Know Your Upstream Provider

In the case of TRS and IP CTS, Hamilton Relay utilizes a limited number of vetted upstream providers. This limits the amount of illegal traffic carried or processed by its network. Hamilton Relay has longstanding relationships with these upstream providers and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. In addition to an awareness of the nature of their business, Hamilton collects information about these providers such as their physical business location, contact persons, their state of incorporation, tax identification number, and RMD status.

Further, Hamilton is committed to taking steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any future contracts that Hamilton Relay may directly have with any upstream provider entities. To the extent that Hamilton Relay's upstream providers attempt to use its network to carry or process a high volume of illegal traffic, Hamilton Relay may terminate that agreement. Hamilton also periodically reviews the details of its providers' robocall mitigation programs to ensure that they continue to be in compliance with Commission rules.

Call Analytics Systems Used to Identify and Block Illegal Traffic

Hamilton Relay routinely monitors the usage and quality of its network facilities and conducts recurring and timely reviews of its call detail records to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate the existence of illegal robocalls. Where Hamilton Relay identifies activities or patterns consistent with illegal robocalls, it investigates those calls and takes remedial actions including, where appropriate, terminating service. Consistent with FCC rules, we do not judge call content or calling behaviors other than for the purposes of identifying potentially problematic patterns. In the case of IP CTS where user registration is required, we have mechanisms in place intended to prevent unauthorized registrations that might be used by robocallers. Hamilton Relay does not use third-party analytics providers.

Preventing New and Renewing Customers from Originating Illegal Calls

As a PSTN TRS provider, Hamilton Relay does not have a direct relationship with any customers. Users of PSTN TRS service are not required to register with Hamilton Relay. PSTN TRS are generally contracted by individual state entities. For these state services, although Hamilton Relay may notify a state of suspicious calling activity, it is the state's decision whether to restrict a person's access to Relay.

Pursuant to the FCC's Internet-based TRS rules, to use the service, IP CTS users must register, provide numerous contact details which includes their full name, complete and verifiable registered address, date of birth, and the last 4 digits of their Social Security number, and a certification under penalty of perjury that they are entitled to use IP CTS. Once registered for the service, users generally do not have to go through a renewal process. Users of the IP CTS service also agree to comply with Hamilton Relay's Terms and Conditions which prohibit users from using the service for any unlawful, abusive, or fraudulent purposes. Hamilton Relay is required to store this user registration information in compliance with FCC rules. As permitted by FCC regulations, Hamilton may suspend the use of the services if any users breach Hamilton Relay's Terms and Conditions. IP CTS users would also have agreements with and be subject to stipulations from their voice service provider, which would likely also terminate service to the extent it is being abused.

Additionally, once it becomes operational, as an IP CTS provider, Hamilton Relay will be required by FCC TRS rules to provide this registration information to the TRS User Registration Database ("TRS-URD") in order to validate the registration information.

Traceback Commitment

Hamilton Relay commits 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 its service to carry or process calls.

As part of its efforts to assist in the successful traceback of illegal robocalls, Hamilton Relay commits to including within any future carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged. In part, these related contract provisions will specify the need for parties to promptly identify, to the extent feasible, the upstream provider from which a suspected illegal robocall entered its network or the customer of the service from which the call originated. Hamilton Relay's upstream providers share this commitment and will be accountable for cooperating with any traceback requests received.

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