

PGB Fiber LLC

Robocall Mitigation Plan

PGB Fiber LLC (“PGB”) is a voice service provider that does not have a *STIR/SHAKEN* implementation obligation because it lacks control of network infrastructure that is necessary to implement *STIR/SHAKEN*. All calls that originate on PGB’s network are subject to its Robocall Mitigation Plan.

Preventing The Origination of Illegal Robocalls

PGB takes the following steps to prevent the origination of illegal robocalls:

Know Your Customer Policy

PGB follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). PGB vets new and renewing customers. PGB will confirm the identity of new and renewing residential and business customers by collecting identifying information including, as applicable, SNN, date of birth, contact person for the business, physical address, state and/or country of incorporation, and federal tax ID. New customers requesting an excessive number of call paths will be screened for legitimate usage needs. New and existing customers with an excessive number of call paths will receive robocall outreach. All residential and business customers are only able to place calls originating from their own phone number. Call ID and call records are reviewed when service is installed to verify legitimate caller ID information.

Network Monitoring

PGB relies on network monitoring software provided by TransNexus to monitor outbound voice traffic to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. The TransNexus software provides Do-Not-Originate detection, reporting, and blocking services for calls that transit the network. This allows High Plains to block calls that are highly likely to be illegal based on a reasonable Do-Not-Originate list in accordance with the FCC’s rules. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate with our Acceptable Use Policy, which prohibits utilizing services for deceptive purposes, engaging in fraudulent activities, and violating local, state, or federal laws.

Know Your Upstream Provider

PGB’s sole upstream provider is one of its parent companies, GBT Communications, Inc., which is registered in the FCC’s Robocall Mitigation Database.

Commitment To Traceback Requests

PGB commits to cooperating with the Federal Communications Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that are using PGB's service to originate calls. PGB commits to fully responding to all traceback requests within 24 hours.

Robocall Certification Filings

PGB (including any entity for which PGB shares common ownership, management, directors, or control) has NOT been the subject of a formal Federal Communications Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to PGB transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or filing a deficient Robocall Mitigation Database certification or mitigation program description. PGB has not been prohibited from filing in the Robocall Mitigation Database; nor has PGB ever had a prior robocall certification removed by Federal Communications Commission action.

PGB Fiber LLC – Point of Contact – Robocall Issues

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