

BTC COMMUNICATIONS, LLC ROBOCALL MITIGATION PLAN

BTC Communications, LLC is a small carrier that resells VoIP services to our customers using the wholesale services of Toly Digital. BTC Communications is registered with the STI-PA as an authorized user in the STIR SHAKEN environment via its affiliate Bledsoe Telephone Company. The BTC IP calls are signed with the Bledsoe Telephone Cooperative certificate.

BTC Communications, LLC has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network.

All calls that originate on BTC Communications, LLC are subject to the described robocall mitigation program.

Robocall Mitigation Program

Robocall Mitigation Plan

BTC Communications, LLC uses Toly Digital to provide Voice over Internet Protocol service to our customers. Toly Digital uses software provided by TransNexus to monitor their outbound voice traffic to identify and prevent the potential origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts them 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. They immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. Toly would then contact us to notify us of the situation. If we determine that the caller was attempting to originate unlawful robocalls, we either warn them to stop or terminate their service as appropriate.

Additionally, the Toly Service provides our customers tools when receiving inbound calls to utilize STIR/SHAKEN information (or lack thereof), as well as other filters to help identify and/or screen potential robocalls.

Traceback

BTC Communications, LLC 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 service to originate, carry, or process illegal robocalls. BTC Communications commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Know Your Customer

BTC Communications, LLC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. BTC Communications, LLC 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.

Upstream Provider Knowledge

BTC Communications LLC, via Toly, knows all the carriers from which it receives traffic and has confirmed that all its connected carriers are listed in the Robocall Mitigation Database.

BTC Communications LLC. has also reviewed the connected carrier's RMPs to learn how the carriers monitor their originating traffic to mitigate illegal robocalls.

BTC Communications LLC is now incorporating traceback and prohibited traffic language in all contractual agreements with upstream carriers.

Customer Education

BTC Communications, LLC posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity. We also provide information via Facebook and bill inserts occasionally.