

Robocall Mitigation Plan for
South Hadley Electric Light Department
February 26, 2024

The Federal Communications Commission (“FCC”) has directed certain providers to upload a Robocall Mitigation Plan to the Robocall Mitigation Database portal that describes the specific reasonable steps the provider has taken to avoid, as applicable, the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation plan. Specifically, the FCC requires the following to be included in robocall mitigation plans: (1) voice service providers must describe how they are meeting their existing obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls; (2) non-gateway intermediate providers and voice service providers must, like gateway providers, describe any “know-your-upstream provider” procedures in place designed to mitigate illegal robocalls; and (3) all providers must describe any call analytics systems they use to identify and block illegal traffic including whether they use a third-party vendor or vendors and the name of the vendor(s). This Robocall Mitigation Plan is being filed in accordance with the above-referenced requirements.

Entities Covered by this Filing

South Hadley Electric Light Department

STIR/SHAKEN Implementation

South Hadley Electric Light Department offers voice services to its customers. South Hadley Electric Light Department can initiate, maintain, and terminate SIP calls throughout its network. As such South Hadley Electric Light Department has fully implemented STIR/SHAKEN in its network.

Robocall Mitigation Plan

South Hadley Electric Light Department takes steps to prevent or avoid the origination of illegal robocalls and has implemented specific measures to detect and prevent illegal robocalls on its network.

South Hadley Electric Light Department has procedures in place to prevent new and renewing customers from using the South Hadley Electric Light Department network to originate illegal robocalls. South Hadley Electric Light Department 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. South Hadley Electric Light Department utilizes the “know-your-customer” screening process to mitigate the use of its network to originate illegal robocalls.

South Hadley Electric Light Department customers are subject to enforceable terms of use and an acceptable use policy for use of all South Hadley Electric Light Department provided services. These policies prohibit use of South Hadley Electric Light Department services for any purpose other than the intended purpose, including use of the services for criminal activity or use in a manner inconsistent with applicable laws, rules, and regulations.

South Hadley Electric Light Department has implemented internal monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network.

Specifically, all lines and trunks served on South Hadley Electric Light Department's network are provisioned with a single telephone number, or a specific set of telephone numbers that are assigned for the use of a single customer. These telephone numbers have been assigned only for the use on the lines or trunks provisioned for that specified customer. All calls originated by any customer on South Hadley Electric Light Department's network must carry a Caller ID limited to one of the telephone numbers specifically assigned to that customer. Any attempt to use a number not assigned to that customer when originating a call will be blocked by South Hadley Electric Light Department's network because of these controls. This blocking occurs when a customer attempts to use a telephone number for which it has not been assigned, whether the attempt was made directly by the customer or as a result of some malicious intrusion of the customer's equipment.

Further, South Hadley Electric Light Department can identify the specific customer that originates any call on its network. Thus, South Hadley Electric Light Department is prepared to respond to any inquiries regarding any calls that have originated on its network and meet its obligations.

South Hadley Electric Light Department has completed the "know-your-customer" screening process for the carriers to which it interconnects. South Hadley Electric Light Department is subject to provisions in its interconnection and commercial agreements that require South Hadley Electric Light Department to take steps to prevent illegal robocalls on its network.

If South Hadley Electric Light Department has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

South Hadley Electric Light Department utilizes call analytics software from Neustar's (part of Transunion) to assist with the detection of illegal robocalls on its network. As part of Neustar's Robo Call Mitigation, South Hadley Electric Light Department tagging the CNAM of numbers as Fraud when the originating number is not part of the North American Numbering Plan (NANPA) or a known robocall offender and tagging Robo or Spam based on Neustar's scoring and analytics.

Responding to Traceback Requests and Cooperation with State and Federal Regulators

South Hadley Electric Light Department commits to respond to traceback requests and to cooperate with investigating and stopping illegal robocalls as necessary. South Hadley Electric

Light Department will respond to traceback requests received from the Industry Traceback Group, the FCC, or law enforcement within 24 hours as required under FCC rules.

South Hadley Electric Light Department also will cooperate with state and federal regulators to prevent, detect, and mitigate illegal robocalls as applicable. South Hadley Electric Light Department will: respond to valid law enforcement requests; provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Principals, Affiliates, Subsidiaries, and Parent Companies

As of February 26, 2024, the corporate officers of South Hadley Electric Light Department are:



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