

Laurel Highland Long Distance Company

Laurel Highland Long Distance Company Robocall Mitigation Plan

(Original submission 2-26-2024; Recertify 2-18-2026)

Laurel Highland Long Distance. (LHLD) provides long-distance service on a resale basis and is thus considered a non-gateway intermediate provider under Federal Communications Commission (FCC) rules. LHLD, as a long-distance reseller, is not under an obligation to implement STIR/SHAKEN pursuant to the *Second Caller ID Authentication Report and Order, 36 FCC Rcd 1859, 1868, para. 19 (2020)* as it lacks control over the network it uses to provide service.

1. Know our customers.
 - a. Enterprise: Verify that the corporate entity and business purpose are legitimate.
 - b. Telecoms: Verify telephone numbers are being legitimately used.
 - c. Use Case: Verify and educate customers regarding vertical, opt-in, and calling practices.
 - d. Identity: Verify and update Caller ID, CNAM, and verified calls.
2. Stir/Shaken
 - a. We have completed the Stir/Shaken Certificate process. We have Stir/Shaken operational. ANPI, LLC and IMPACT/Lingo, IXC, have requested SIP trunks from our central office for originating calls.
 - b. We have set up an account with ICONECTIV for Stir/Shaken tokens.
 - c. FCC expects voice service providers to exercise due diligence before accepting traffic from an upstream provider (Verizon).
3. Traceback
 - a. We will actively participate in the Traceback community including the FCC, law enforcement, and the industry traceback consortium. We follow 52 Pa. Code, CFR 63.131-137 Confidentiality of Customer Communications, and Information.
 - b. In accordance with AS per 47 CFR § 64.6305 (e), LHLC Broadband has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, phone number, and email address are available within the Robocall Mitigation Database.

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- c. LHTC Broadband 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.
- d. LHTC Broadband certifies it has not been prohibited from filing in the Robocall Mitigation Database and has not been subject to any Commission, law enforcement, or regulatory agency action or investigation suspected unlawful robocalling or spoofing.
- e. Monitoring
 - a. We have installed a Sansay VXS Session Border Controller to monitor excessive calls and repeated calls reports daily.
 - b. Sansay, our vendor, has set up Call Analytics in the system to identify and block illegal robocall traffic.
- f. Robocall Mitigation Program
 - a. LHTC Broadband has committed to a Robocall mitigation program for all originating calls made from our network. We will immediately investigate any potential Robocalls or suspicious calls, and if warranted, we will notify the customer to stop originating unlawful calls to terminate their service as appropriate.
- g. Implementation of Stir/Shaken
 - a. We have implemented Robocall Mitigation Plan and Stir/Shaken as of June 30, 2023.