

Crown Point Network Technologies

Robocall Mitigation Certification and Program

Crown Point Network Technologies, Inc. d/b/a Bridge Point Communication (Crown Point or Company) submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission's (Commission's or FCC's) rules.

STIR/SHAKEN Implementation

Crown Point is a voice provider without a STIR/SHAKEN obligation. The Company lacks control over the network infrastructure necessary to implement STIR/SHAKEN and therefore has no STIR/SHAKEN implementation obligation.

Enforcement

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

Crown Point and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing.

Crown Point has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

Company commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Company will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

Identifying Information

All business names previously used: none

Company is not a foreign voice service provider.

OCN:716G

Affiliates: Bridge Point Communication

Parent: Crown Point Telephone Corporation

Principals:

Individual within company responsible for addressing robocall mitigation-related issues:

Alexandra Towne, Vice President
Executive Department
46 Porter Mill Rd, P.O. Box 275, Crown Point NY 12928
518-597-3300; alexandra.towne@cptelco.net

I, Alexandra Towne, Vice President for Crown Point submits this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.

Alexandra Towne sign

Date 12/27/2024

ROBOCALL MITIGATION PROGRAM

Crown Point has taken specific reasonable steps to avoid carrying or processing illegal robocall traffic. As a reseller, Crown Point relies on procedures, policies, and safeguards implemented by its underlying voice provider, Toly Digital Networks (Toly).

Toly utilizes software provided by TransNexus to monitor outbound voice traffic to identify and prevent the potential 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. Upon notification from Toly, Crown Point will immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls.

If there is a reasonable basis to believe that a customer is originating illegal calls, the Company will take action, consistent with our Acceptable Use Policy (AUP), including providing the customer with a warning, suspending or terminating the customer's service, and/or reporting the misconduct to the appropriate authorities. Our AUP includes a provision requiring customers to comply with all applicable laws in connection with the customer's use of our services. Crown Point's customers must agree to abide by the AUP.

In its Robocall Mitigation Plan, Toly states, "our network will support call termination services for our customers where we are not originating the call but passing the call over our networks/partners via SIP and ensuring we or our partners maintain STIR/SHAKEN information in the SIP messaging" and "we provide 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."

Know-Your-Customer. Our customers are members of the local community in which we operate. Therefore, we know our customers and do not consider our network at high risk of originating illegal robocalls. As part of our standard operating procedures, we conduct due diligence on new and renewing voice customers by collecting personal identifiable information. For business customers, we collect information concerning the company's name, address, physical location, contact information, and Federal Tax ID, where appropriate. With respect to residential customers, we verify customers' names and addresses, and physical service locations.

Know-Your-Upstream Provider. Crown Point relies on Toly's know-your-upstream provider processes.

Traceback. Crown Point will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

Crown Point reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.