



131 Lakewood Road
PO Box 431
Skowhegan, Maine 04976-8276
Fax 207-474-0966
207-474-2727
www.getbeeline.com

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Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Bee Line, Inc. (Bee Line, Bee Line, Bee Line Cable Broadband Solutions), pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all "voice service providers" to establish a "robocall mitigation plan". This document sets forth the Provider's current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network.

Bee Line is a provider of Cable TV, Telephone and broadband Internet services primarily delivered by a hybrid fiber-coax (HFC) network. Bee Line's services are entirely based in the State of Maine.

Alianza, Inc. (Alianza) is Bee Line's sole underlying voice service carrier. Accordingly, Bee Line relies on procedures, policies and safeguards implemented by Alianza to ensure that Bee Line's residential and business customers are sufficiently protected against robocall and spoofing activities.

Traceback

Bee Line responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

STIR/SHAKEN

Bee Line is compliant to STIR/SHAKEN requirements through its underlying carrier (Alianza) certifying all outbound calls using their certificate and validating all inbound certificates. All Bee Line provided voice services operate through Alianza's network.

Know Your Customer

Bee Line vets the identity of its customers when subscribing for services, including telephone service. As part of this vetting process, Bee Line collects the customer's legal name and address, physical location, contact information, verifies identity (Drivers License, State ID), and may require additional information to validate the customer in the case of a business.

Robocall Mitigation Program

[See Attached Alianza Robocall Mitigation Plan]



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Alianza uses call analytics to monitor Bee Line's outbound voice traffic in real time to prevent the origination of illegal robocalls. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then Bee Line will warn or terminate their service as appropriate pursuant to its Acceptable Use Policy.

All non-trunked customers (a majority of Bee Line's phone customers) are restricted by Alianza's platform to only provide Caller ID information directly related to phone numbers on the customer's account.

Bee Line provides trunked service to a limited number of customers and only to equipment managed by Bee Line. Those customers are Small Business customers (SMBs) operating using an on-premise PBX and are not call centers. Bee Line does not provide trunked services to customer managed equipment.

Bee Line does not provide any services (including phone services) to customers outside of their network footprint.

ALIANZA ROBOCALL MITIGATION PLAN

As part of its Robocall Mitigation Database filing required under the FCC's *Sixth Caller ID Authentication Report and Order* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (Mar. 17, 2023)), this document describes Alianza's certifications and robocall mitigation plan to detect and prevent unlawful robocalls from originating on its network.

1. ALIANZA'S CORPORATE INFORMATION

Alianza, Inc. is a Delaware corporation. Its primary address is provided within the Robocall Mitigation Database.

Alianza certifies it has not been prohibited from filing in the Robocall Mitigation Database and Alianza has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), Alianza 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.

2. STIR/SHAKEN CERTIFICATION

Alianza hereby certifies that all voice traffic originating on its network is authenticated in compliance with applicable standards under 47 CFR § 64.6301.

3. KNOW-YOUR-UPSTREAM-PROVIDER PROCEDURES

Alianza has existing agreements with Tier-1 carrier service providers from which it facilitates the provision of carrier services to its service provider customers. Alianza has confirmed that each of those carriers are listed in the RMD. Alianza also enables its customers to contract directly with carrier service providers to enable those customers' use of Alianza's Cloud Communications Platform. In each case, Alianza has provided detailed onboarding and fraud detection guidance to require and enable its customers to comply with their obligations to prevent and mitigate illegal robocalling.

4. KNOW-YOUR-CUSTOMER PROCEDURES

For the purposes of this robocall mitigation plan, Alianza's customers are regulated communications service providers with their own STIR/SHAKEN obligations. While Alianza's STIR/SHAKEN compliance efforts work hand-in-hand with its customers STIR/SHAKEN compliance efforts, each service provider customer must develop and file its own RMD plan under the *Sixth Order and Report*.

Upon at the beginning of each customer relationship, Alianza's sales and customer success teams engage in a discovery process with each potential customer to understand the customer's subscriber base and to educate those potential customers about the operation of Alianza's Cloud Communications Platform. During the discovery process, Alianza shares critical information about its fraud detection and prevention processes. That information remains available to each service provider after it transitions to become Alianza's customer. Finally, as part of its discovery process, Alianza also encourages potential customers

to obtain third-party service from Telephone Science Corporation, dba Nomorobo, for additional robocall mitigation coverage.

5. CONTRACTUAL TERMS AND OTHER CONDITIONS

Alianza's customer agreements contain fair use and protection policies that allow Alianza to immediately terminate any services to any subscriber or device to prevent automated call blasting, mass calling events, and other fraudulent or illegal activity.

Alianza agreements with its underlying carrier services providers also include provisions requiring the parties' compliance with applicable robocall prevention and mitigation standards.

6. FRAUD DETECTION AND MITIGATION

Alianza has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. Through this fraud detection and mitigation process, Alianza then notifies individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Detailed information about this fraud detection and mitigation process is provided to each customer through Alianza's knowledge base and support resources. Alianza may take remedial action against any subscriber's account to prevent or remediate robocalling or other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service .

7. ENFORCEMENT

Alianza promptly responds to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group. Alianza also cooperates with those entities and with its carrier partners to investigate and prevent any illegal robocallers from using Alianza's services to originate calls. Alianza employees engage directly with Alianza's customers to suspend or disable subscriber accounts identified as originating unlawful robocalls through Alianza's network.