

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
May 25 2024	Brightengale	Initial Version

Objective:	Establish and follow a policy that is compliant with TRACED Act
-------------------	---

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

Brightengale is a small voice service provider with both TDM and SIP services in its network and we believe we are temporarily exempt from the requirements of §64.6301 as we participate with the industry to find an implementation solution before June 30, 2023.

Brightengale is partnering with a trusted provider to implement STIR/SHAKEN in parts of its network as it is realistically able to so and has implemented this policy for those portions of its network not yet compliant.

II. General Prohibition Against Illegal Robocalling

Brightengale end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

Robocall Mitigation Policy

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Brightengale service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

Brightengale's end users are notified that Brightengale may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

Brightengale utilizes the mitigation technique of "Know Your Customer." Brightengale is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Brightengale has set a call path level based on its average customer size. The level – referred to as "large volume calling capability" – is subject to change.

Brightengale has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A CWT representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

Brightengale serves a small number of long-time business end users with large volume calling capability that are being directly contacted to review with them Brightengale's policies and efforts to prevent the Brightengale network from being used for illegal robocalling.

IV. Network Monitoring

Brightengale is continuing development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.

Robocall Mitigation Policy

V. Traceback and Enforcement Cooperation

Brightengale will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Brightengale will dedicate sufficient resources to provide prompt and complete responses to traceback requests.