

BF COMMUNICATIONS INC. Robocall Mitigation Plan

Introduction

BF COMMUNICATIONS INC. has implemented a comprehensive **Robocall Mitigation Plan** to combat illegal robocalls and spoofing in compliance with **FCC regulations**, including the **TRACED Act** and **47 CFR § 64.6300 et seq.** This plan outlines our strategies for monitoring, detecting, and mitigating unlawful robocalls while safeguarding consumers. It will be submitted to the **FCC's Robocall Mitigation Database** and updated regularly to address emerging threats and regulatory changes.

Key Objectives

1. **Prevent Illegal Robocalls** – Deploy advanced systems to detect and block fraudulent robocall activity.
2. **Ensure Compliance** – Adhere to **STIR/SHAKEN**, traceback requirements, and **Know-Your-Customer (KYC)** protocols.
3. **Protect Consumers** – Proactively identify and stop spoofed and unwanted calls.
4. **Collaborate with Stakeholders** – Work with regulators, law enforcement, and industry partners to investigate and mitigate illegal robocall operations.

STIR/SHAKEN Implementation

- **IP-Based Networks:** Fully implemented **STIR/SHAKEN** for caller ID authentication (per **47 CFR § 64.6302(b)**).
- **Non-IP Networks:** Compliant with **47 CFR § 64.6305**, using alternative robocall mitigation measures.

Monitoring & Detection

BF COMMUNICATIONS INC. employs **real-time traffic analysis** to identify robocall patterns, including:

- **High-volume call spikes**
- **Caller ID validation** (flagging spoofed/unallocated numbers)

- **Reputation monitoring** (checking spam reports & FCC complaint data)

Response to Suspicious Activity

1. **Traceback & Investigation** – Identify call sources (originating/routing/terminating parties).
2. **Authorization Check** – Suspend unauthorized number usage.
3. **Service Suspension** – Block offending parties from using our network.
4. **Regulatory Cooperation** – Respond to **FCC/law enforcement** traceback requests within **24 hours**.

Subscriber & Provider Vetting

- **Subscriber Verification:**
 - Standard checks for residential/retail users.
 - Stricter reviews for **high-volume callers** (e.g., call centers).
- **Know-Your-Upstream-Provider (KYUP):**
 - Maintain a **verified carrier database**.
 - Require **physical business details** in interconnection agreements.

Traceback & Reporting

A **designated point of contact** handles all traceback requests, ensuring:

- **24-hour response time** to FCC/law enforcement.
- **Full cooperation** in investigations.

Third-Party Partnerships

- **Caller Authentication:** Tools like **TransNexus** and **Aureon CIDA** validate caller IDs.
- **Outbound Call Blocking:** Prevents calls from **spam-listed/invalid numbers**.

Ongoing Compliance & Updates

This plan will be **reviewed regularly** to adapt to new threats, technologies, and FCC requirements.

Certification

BF COMMUNICATIONS INC. certifies:

1. Compliance with **47 CFR § 64.6305**.
2. No prior FCC/law enforcement actions related to robocalls.
3. Submission of all required data to the **FCC Robocall Mitigation Database**.

This plan underscores BF COMMUNICATIONS INC.'s commitment to **fighting illegal robocalls and protecting consumers** through proactive measures and regulatory adherence.