

Robocall Mitigation Plan

1. Company Information

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2. Certification of Compliance

The Telephone Company LLC ("TTC") hereby certifies that it has developed and implemented a Robocall Mitigation Plan consistent with the requirements set forth by the Federal Communications Commission (FCC). TTC commits to diligently implementing the practices described herein to prevent the origination, carriage, and transmission of illegal robocalls on its network.

3. Provider Type and Network Description

TTC operates as a non-facilities-based Voice over Internet Protocol (VoIP) provider. TTC does not own the underlying transport facilities (e.g., fiber optic cables, copper lines) but utilizes network capacity and services provided by upstream carriers and interconnected VoIP providers to originate, route, and terminate voice traffic for its customers.

4. Robocall Mitigation Program Details

TTC employs a multi-faceted approach to mitigate illegal robocalls, leveraging the fact that it is a non-facilities-based provider:

a. Know Your Customer (KYC) Procedures:

- TTC implements reasonable KYC processes to verify the identity and legitimacy of its customers, particularly those originating higher volumes of traffic.
- This includes collecting business registration information (if applicable), contact details, and service address.
- TTC audits and verifies via testing to confirm customer use cases.

- TTC has notification measures set in place that trigger when call pattern anomalies are captured.
- Suspicious applications or those failing verification checks are denied service.

b. Contractual Obligations:

- Customer service agreements include clauses prohibiting the use of TTC's services for illegal purposes, fraud, and abuse, including violations of the Telephone Consumer Protection Act (TCPA) and the TRACED Act.
- TTC reserves the right to monitor traffic, suspend, or terminate service for violations.
- Contracts with upstream providers require them to cooperate in traceback efforts and implement their own robocall mitigation strategies, including STIR/SHAKEN where applicable.

c. Traffic Monitoring and Analysis:

- TTC utilizes [Specify tools/methods, e.g., Call Detail Record (CDR) analysis, third-party analytics platforms, internal heuristics] to monitor traffic patterns across its network.
- Analysis focuses on identifying suspicious activity indicative of illegal robocalling, such as:
 - Unusually high call volumes from a single source.
 - Excessive short-duration calls.
 - High number of unanswered calls or calls to invalid numbers.
 - Anomalous calling patterns (e.g., time of day, geographic distribution).
 - Use of invalid or unallocated Calling Party Numbers (CPNs).
 - Traffic exhibiting characteristics flagged by industry threat intelligence feeds.
 - Alerts generated by monitoring systems trigger further investigation.

d. Blocking and Mitigation Actions:

- Upon identifying traffic reasonably believed to be illegal robocalls, TTC will take appropriate mitigation steps, which may include:
 - Blocking calls from specific originating numbers or IP addresses identified as sources of illegal traffic.
 - Working with upstream providers to block malicious traffic before it reaches TTC's platform.

- Investigating customer accounts associated with suspicious traffic, potentially leading to warnings, service suspension, or termination.
- Implementing reasonable analytics-based blocking informed by traffic patterns and threat intelligence, ensuring compliance with FCC rules regarding permissible blocking.

e. Cooperation with Industry Traceback Efforts:

- TTC commits to fully cooperating with the official Industry Traceback Group (ITG) designated by the FCC.
- TTC will respond promptly and comprehensively to traceback requests regarding suspicious traffic transiting its network.
- TTC will assist in identifying the source of potentially unlawful calls, whether originating from its own customers or received from upstream providers.

f. Upstream Provider Collaboration:

- As a non-facilities-based provider, TTC relies on its upstream voice providers. TTC actively communicates and collaborates with these providers regarding robocall mitigation.
- This includes sharing information about suspicious traffic patterns observed by TTC and requesting investigation or blocking actions from the upstream provider when the source appears to be on their network.
- TTC verifies that its primary upstream providers are registered in the RMD and have certified robocall mitigation programs.

g. Complaint Handling:

- TTC provides clear channels for customers and other parties to report suspected illegal robocalls (e.g., dedicated email address, phone number, web form).
- Complaints are investigated promptly, and findings are used to inform mitigation actions and analysis efforts.

6. Commitment to Traceback Cooperation

TTC explicitly commits to responding fully, truthfully, and in a timely manner (generally within 24 hours or less) to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group concerning potential illegal robocall traffic. The designated contact for such requests is listed in Section 1.

7. Law Enforcement Cooperation

TTC will cooperate with law enforcement agencies in investigating illegal robocalling activities, subject to applicable legal requirements and processes such as subpoenas or court orders.

8. Plan Updates

This Robocall Mitigation Plan will be reviewed at least annually and updated as necessary to reflect changes in technology, regulations, threat landscape, and TTC's operational practices. Significant updates will be filed with the FCC's Robocall Mitigation Database.