

Massachusetts Local Telephone Company, Inc.

Caller ID Authentication Plan and Robocall Mitigation Plan

Introduction. Massachusetts Local Telephone Company, Inc. (MLTC), pursuant to Federal Communications Commission (FCC) rules 47 C.F.R. §§ 64.6301, 64.6305, and the FCC’s “Best Practices,” adopts the following Caller ID Authentication Plan (“Plan”). The Plan is current and may be subject to change to comply with FCC regulations and requirements, as may be amended.

Commitment. Pursuant to 47 C.F.R. § 64.6305, MLTC commits to take all reasonable steps to avoid originating illegal robocall traffic, and shall include a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. As set forth below, MLTC has adapted the North America Numbering Council Call Authentication Trust Anchor Working Group’s *Best Practices for the Implementation of Call Authentication Frameworks* (“Best Practices”) into its Plan.

Compliance. MLTC is a provider of “voice service” as set forth in FCC rule 47 C.F.R. §64.6300(l). MLTC certifies that all voice traffic that originates on its network is authenticated under the STIR/SHAKEN authentication framework, pursuant to 47 CFR § 64.6301(a). For all voice traffic, including traffic that originates on underlying carrier networks over which MLTC lacks control of the network infrastructure necessary to implement the STIR/SHAKEN authentication framework, MLTC internally performs Subscriber Vetting, Telephone Number Validation, and Network Traffic Monitoring Analysis and Investigation as set forth below, in conjunction with its underlying carrier caller ID authentication framework. To this end, MLTC shall:

1. Authenticate and verify caller identification information for all SIP calls that exclusively transit its own network;
2. Authenticate caller identification information for all SIP calls it originates and that it will exchange with another voice service provider or intermediate provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next voice service provider or intermediate provider in the call path; and
3. Verify caller identification information for all SIP calls it receives from another voice service provider or intermediate provider which it will terminate and for which the caller identification information has been authenticated.

Caller ID Authentication and Robocall Mitigation Plan. In accordance with Best Practices, the following constitutes MLTC’s Caller ID Authentication Plan and Robocall Mitigation Plan:

Company Information

The name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues is as follows:

Dexter Miller, President
Massachusetts Local Telephone Company, Inc.
1953 Dorchester Ave.
Dorchester, MA 02124
Telephone: 617-755-4756
Email: admin@masslocaltelephone.com
cc: masslocal@aol.com

Authentication

MLTC does not operate under an assumed name. MLTC is not a foreign voice service provider and does not serve subscribers who are physically located outside of the U.S., its territories or Canada.

MLTC has call authentication that complies with caller ID authentication requirements for voice traffic originating on its network. MLTC digitally signs outbound calls to battle spoofing and assure customers of legitimate calls, utilizes analytics to detect illegal and unwanted inbound calls, applies call treatment by overwriting the caller ID with "SPAM" or "Fraudulent Call" based on the fraud score, generates fraud alerts, provide the ability to block calls and enables reporting via a data analytics dashboard.

MLTC identifies Toll Free and Local Numbers that should not be receiving calls, and provides automated and ad hoc reporting to analyze traffic patterns and calling data such as average call duration, Answer Seize Ratio ("ASR"), and total calls to unique numbers.

And, MLTC proactively distinguishes communications fraud from legitimate customer usage to help combat fraud schemes. This is done by employing dynamic usage profiling and other monitoring metrics to identify suspicious activity regardless of the way unauthorized access was gained.

In addition, MLTC performs the following functions internally to authenticate its subscriber callers:

Know Your Customer

MLTC provides voice service exclusively to commercial subscribers and government agency subscribers. MLTC vets subscribers before providing service. MLTC obtains specific subscriber information which may include but not be limited to service locations, Tax ID for a credit check, contact person(s) and principals and verifies location for all subscribers. Further, MLTC compares information provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. Subscribers are served under a service agreement, online Terms of Service, and/or a Moderation of Use and Acceptable Use Policy.

Telephone Number Validation

For new subscribers, MLTC will assign telephone numbers to the subscriber, unless the subscriber ports telephone numbers from another service provider. MLTC ensures that only those subscriber telephone numbers held by its subscribers may originate traffic (with some exceptions for specifically negotiated services for certain customers). For toll-free numbers, MLTC verifies the underlying ten-digit number and ensures that only calls from the assigned numbers may originate calls. MLTC can trace calls directly back to the customer's network/IP.

Network Traffic Monitoring, Analysis and Investigation

MLTC monitors its subscribers' traffic for call, originating number and terminating number irregularities in conjunction with its underlying carriers, and should irregularities be determined, will promptly contact the subscriber as part of its investigatory process.

MLTC coordinates with its underlying carriers to monitor subscriber traffic, identify traffic anomalies for which MLTC will investigate, and to promptly block subscriber service if robocalling is suspected. Detection of illegal activity and violations will result in service termination.

MLTC monitors its networks in real-time, allowing it to identify suspicious network activity (based on abnormal call patterns, atypical call activity, hot lists, and subscriber information). MLTC stops unwanted events by blocking calls originating from upstream providers that have not certified their robocall mitigation practices in the FCC's Robocall Mitigation Database. MLTC implements this measure by blocking at its switches and can tear down active calls. There are automatic alerts and automatic disabling systems based on predefined parameters. MLTC's systems allow it to create ad hoc reports as well as automated custom reporting and alarms with detailed call analytics to examine suspicious traffic patterns and usage statistics.

Response to Traceback Requests

Consistent with its commitment above, MLTC will respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Customer Contracts

Provisions in customer contracts, tariffs, and service guides prohibit any unlawful, abusive or illegal use of services. Contractual provisions also provide MLTC with the right to suspend or interrupt service that is being used to violate these policies. MLTC will seek to identify the party that is using its network to originate such calls and take appropriate action under the customer's contract. MLTC has updated its terms of service to expressly include a prohibition on the use of the service in any illegal, fraudulent, improper, inappropriate, and/or unauthorized manner.

Customer and Employee Awareness

MLTC utilizes a STIR/SHAKEN or an approved Robocalling Mitigation Program focused on compliance and awareness for all calls that originate with U.S. calling numbers. MLTC has documentation available to customers and employees explaining STIR/SHAKEN, robocalling mitigation and fraud. This documentation explains the products, procedures and methods we use to combat fraud and robocalling. Information about STIR/SHAKEN and Robocalling Mitigation has been distributed and is available companywide.

Ongoing Robocall Mitigation

MLTC anticipates that its Plan will evolve as it makes Plan enhancements, as underlying carriers enhance their own plans, and as the Trust Anchor and industry generally gain experience in caller ID authentication protocols. MLTC intends to promptly amend its compliance plan as changes may occur.

In summary, MLTC's Robocall Mitigation Plan includes measures to prevent illegal robocalls, ensure timely responses to traceback requests, actively cooperate with law enforcement, and to be properly certified and documented in the FCC's database. To this end, MLTC certifies that all of the calls that it originate on its network are subject to a robocall mitigation program consistent with paragraph (a) of 47 C.F.R. § 64.6305, that any prior certification has not been removed by FCC action and it has not been prohibited from filing in the Robocall Mitigation Database by the FCC, and that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with § 64.6301(a)(1) and (2).

July 1, 2025

/s/ Dexter Miller, President

Massachusetts Local Telephone Company, Inc.

1953 Dorchester Ave.

Dorchester, MA 02124

1-617-755-4756 (cell)