



Robocall Mitigation Plan

About:

- This robocall mitigation plan is for Vero Broadband, LLC (“Vero Broadband”).
- Vero Broadband is a facilities-based service provider with less than 100,000 subscribers.
- All calls originating from Vero Broadband’s voice network are subject to this robocall mitigation plan.

RMD Filing Eligibility:

- Vero Broadband has not been prohibited from filing a certification in the Robocall Mitigation Database.
- Vero Broadband has not been subject to a commission, agency, or law enforcement action for illegal robocalling or spoofing.

Know Your Customer Procedures:

- Vero Broadband takes reasonable steps to prevent new and renewing customers from originating illegal calls.
- Vero Broadband collects customer information to help prevent illegal originating traffic. Information including, but not limited, to physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the general nature of the business is collected.
- Vero Broadband’s Terms and Conditions and Acceptable Use Policy prohibit customers from illegal activity. Vero Broadband reserves the right to suspend or terminate service for engaging in prohibited practices.

Know Your Upstream Provider Procedures:

- Vero Broadband has verified that our upstream providers have a certification in the Robocall Mitigation database. Vero Broadband will not accept voice traffic from an unregistered upstream provider.

Traceback:

- Vero Broadband responds within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. Vero

Broadband cooperates fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls

Call Analytics:

- Vero Broadband uses call analytics software provided by multiple vendors to monitor outbound voice traffic to prevent the origination or transit of illegal robocalls.
- Vero Broadband investigates any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls.
- Vero Broadband reserves the right to suspend or terminate service if it is determined that the traffic was likely unlawful.

STIR/SHAKEN:

- Vero Broadband has implemented and activated the STIR/SHAKEN authentication framework on the IP/SIP portions of the network where required.
- For certain non-IP, TDM portions of our network, Vero Broadband avails itself of the exemption under § 64.6304(d) as those segments of its network “rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls” and thus “are deemed subject to a continuing extension.”
- Vero Broadband also provides other voice services where upstream providers are responsible for and provide the required STIR/SHAKEN framework.