

Addison County Communications Union District, d/b/a Maple Broadband
Robocall Mitigation Compliance with TRACED Act

Date	Company Contact
02/27/2026	Ellie de Villiers

This mitigation plan is submitted on behalf of Addison County Communications Union District, d/b/a Maple Broadband (“Maple Broadband”). Maple Broadband is a Communications Union District (CUD), which is a special-purpose municipality organized pursuant to Chapter 82 of Title 30 of the Vermont Statutes Annotated and is comprised of twenty member towns. As a municipality, the organizational structure of a CUD is defined by statute. Governance is comprised of a Governing Board made up of delegates and alternates from the member towns of the district. Maple Broadband provides broadband and other services within its member towns. Its officers are as follows:

- Chair: Steve Huffaker
- Vice-Chair: Shannon Haggett
- Treasurer: Lynn Dunton
- Clerk: Adam Lougee

I. Implementation and Extension Status

Status of STIR/SHAKEN Implementation

Maple Broadband offers its customers Voice Over Internet Protocol (VoIP) services as a reseller of white-labeled services offered by Waitsfield-Fayston Telephone Co., Inc. (“WCVT”). Maple Broadband does not control the softswitch, number porting, or call trunking for the associated calls. Accordingly, Maple Broadband does not have the facilities necessary to implement STIR/SHAKEN. Maple Broadband has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

II. Robocall Mitigation Plan

Under its arrangements for authentication and verification with its underlying service provider, Maple Broadband has taken further steps to prevent robocalls from originating from its end user customers.

Know Your Customer

Maple Broadband utilizes the mitigation technique of “Know Your Customer” and follows the North American Numbering Council (NANC) – Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of Maple Broadband’s customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customer’s businesses.

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Robocall Mitigation

Maple Broadband is a small community-owned 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.

Maple Broadband 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.

Maple Broadband 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 Maple Broadband representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

Contractual Terms

All customers are subject to the company’s terms of service that prohibit and warn against illegal calling activities.

Maple Broadband provides a subscription-based, non-commercial legal robocalling product and educates any subscribers or potential subscribers (such churches, school systems) regarding legal versus illegal robocalling activities to insure they are compliant in their use of the product.

Know Your Upstream Provider

While Maple Broadband does not currently serve upstream providers, it recognizes that effective May 28, 2024 its underlying service provider must refuse to carry traffic from any provider not listed in the Robocall Mitigation Database.

Call Analytics Systems

WCVT uses call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts WCVT to outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

WCVT will immediately ask Maple Broadband to investigate any unidentified calls to determine if the caller was attempting to originate unlawful robocalls. If Maple Broadband or WCVT determine that the caller was attempting to originate unlawful robocalls, our policy is to warn them to stop, suspend their service, and/or terminate their account.

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Plan Updates

Maple Broadband will continue to work with WCVT to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.

III. Traceback and Enforcement Cooperation

Maple Broadband, both directly and through its underlying service provider, will actively participate in the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG). Maple Broadband commits to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither Maple Broadband nor any entity which shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.