

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Black Hills Broadband LLC

Filed pursuant to 47 CFR § 64.6305 — WC Docket No. 17-97

Legal entity name	Black Hills Broadband LLC
Business address	3213 W Main Street, PMB 238, Rapid City, SD 57702
FCC Registration Number (FRN)	0036735314
Operating Company Number (OCN)	487M
FCC Form 499 Filer ID	838843
Provider role	Originating voice service provider (interconnected VoIP)
Service territory	Rapid City and surrounding areas, South Dakota
Approx. voice subscriber lines	Approximately 20 (fewer than 100,000)
RMD point of contact	Lucas Hoheisel, Managing Member
Contact email / phone	hello@blackhillsbroadband.com / 605-206-9873
Date of this description	August 27, 2026

1. Overview and Scope

Black Hills Broadband LLC (“BHBB” or “the Company”) is a facilities-based fiber broadband provider headquartered in Rapid City, South Dakota. BHBB offers interconnected VoIP service to retail residential and business end-user customers. BHBB is a voice service provider as defined in 47 CFR § 64.6300(o) and files this description pursuant to 47 CFR § 64.6305(a) and (d).

BHBB delivers voice service under two models:

- **On-net.** Voice service provided as an add-on to BHBB fiber broadband, delivered over BHBB's own access network to a premises BHBB has physically constructed to and installed.
- **Over-the-top (OTT).** Voice service delivered over the public internet to retail residential and business customers within BHBB's regional service area who do not take BHBB broadband. BHBB installs the customer premises equipment for these accounts itself, at the customer's premises, in the same manner as for its on-net accounts.

In both models the customer is a retail end user under contract with BHBB. BHBB does not provide wholesale origination, does not sell origination or trunking capacity to other carriers or resellers, does not act as a gateway provider, does not accept traffic from foreign originating or foreign intermediate providers, and does not act as an intermediate provider for traffic originated by others. Every call originated on BHBB's network is originated by an identified BHBB retail account holder using numbering resources BHBB has assigned to that account.

In both models BHBB dispatches its own technicians to install and configure the customer premises equipment at a verified physical address. BHBB does not activate voice service for any customer whose premises it has not visited, and offers no self-provisioned, remotely activated, or download-and-register voice product. Every account on BHBB's network therefore corresponds to a known person or entity at a physical location that BHBB personnel have attended. This is the foundation of the Company's know-your-customer posture

described in Section 4.

2. STIR/SHAKEN Implementation Status

BHBB has certified in the Robocall Mitigation Database to Option 3, No STIR/SHAKEN Implementation. BHBB is exempt from the requirements of 47 CFR § 64.6301 pursuant to 47 CFR § 64.6304(b), which exempts voice service providers that are incapable of obtaining an SPC token due to Governance Authority policy until such time as they are capable of obtaining one.

STI-GA Policy Decision 001 (SPC Token Access Policy) conditions clearance by the STI Policy Administrator on an entity (1) having a current FCC Form 499-A on file, (2) holding an assigned Operating Company Number, and (3) having certified with the Commission that it complies with the Commission's robocall mitigation program requirements and being listed in the Robocall Mitigation Database. BHBB satisfies the first two criteria — it holds OCN 487M and has Form 499-A on file with the Commission — but cannot satisfy the third until this filing is accepted and listed. BHBB is consequently unable to obtain an SPC token, and without an SPC token it cannot obtain an STI certificate or authenticate calls.

For completeness, BHBB understands that its downstream origination carrier applies STIR/SHAKEN attestation to BHBB-originated traffic under that carrier's own STI certificate. BHBB does not treat that arrangement as its own implementation of STIR/SHAKEN. The calls are not signed with a certificate issued to BHBB, BHBB holds no SPC token, and BHBB accordingly certifies to Option 3. BHBB will amend this description and its Robocall Mitigation Database certification once it authenticates calls using its own certificate.

BHBB will register with the STI Policy Administrator immediately upon its listing in the Robocall Mitigation Database, obtain its own SPC token and a certificate from an approved STI Certification Authority, authenticate the calls it originates on the IP portions of its network using its own certificate, and amend its Robocall Mitigation Database certification to reflect that implementation. Until that work is complete BHBB relies on the measures described below, consistent with 47 CFR §§ 64.6303 and 64.6305(a).

3. Specific Reasonable Steps to Avoid Originating Illegal Robocall Traffic

47 CFR § 64.6305(d)(2)(ii)

3.1 Service model as a structural control

BHBB sells voice service only at retail, to identified account holders, on a per-line or per-seat basis. It does not offer anonymous signup, does not offer bulk or campaign origination products, and does not offer any product that permits an unaffiliated party to originate traffic using BHBB numbering resources. Every voice account is established through an in-person installation by BHBB personnel at a verified physical premises, which forecloses the anonymous, remotely provisioned, high-churn account profile that characterizes most illegal robocall origination.

3.2 Calling line identity controls

- **Calling number screening.** BHBB screens the calling party number presented on every outbound call against the telephone numbers assigned to the originating account. A call presenting a number not assigned to that account is rejected and is not delivered to BHBB's upstream carrier. Subscribers cannot originate traffic presenting arbitrary calling numbers.

- Outbound caller identification for each line is assigned and provisioned by BHBB from its own numbering inventory at the time of service activation.
- BHBB offers no service, feature, portal, or API that permits a customer to set arbitrary caller identification on a per-call basis.
- Where a multi-location business customer requests presentation of a number BHBB has not assigned — for example a main number retained on another carrier — BHBB adds that number to the account's permitted screening list only after obtaining documentary evidence of the customer's right to use it, such as a carrier invoice or letter of authorization. That documentation is retained for the life of the account plus two years.

3.3 Traffic controls and technical limits

- Concurrent call and calls-per-second limits are provisioned per account, sized to the customer's ordinary use. Residential accounts receive conservative defaults; increases require documented business justification and BHBB approval.
- International destinations are disabled by default on all accounts and are enabled only on affirmative customer request. High-cost and high-risk destination ranges remain blocked unless the customer demonstrates a documented business need.
- BHBB blocks outbound calls presenting invalid, unallocated, or unassigned calling numbers, and does not originate calls to numbers on the Industry Traceback Group Do-Not-Originate list, consistent with 47 CFR § 64.1200(k) and subject to the public safety safeguards in 47 CFR § 64.6305(g).
- Auto-dialing, predictive dialing, and outbound calling-campaign platforms are prohibited by BHBB's Acceptable Use Policy absent BHBB's prior written authorization, and customers are required to disclose any intended outbound campaign or high-volume outbound traffic before service is activated.

3.4 Monitoring and enforcement

- BHBB reviews outbound call detail records daily, using the live traffic dashboard provided by its voice platform, for the patterns characteristic of illegal robocalling: sharp increases in outbound volume, high attempt counts with low average call duration, low answer-seizure ratio, sequential or wide-area number dialing, and repeated calls to invalid numbers.
- Automated alerting notifies BHBB network operations staff when an account exceeds its established baseline outbound volume by 200 percent within a rolling 24-hour period.
- Where review indicates apparently illegal traffic, BHBB suspends the account's outbound calling capability, contacts the customer for explanation, and, absent a satisfactory response, terminates voice service. BHBB's service agreement reserves the right to suspend or terminate immediately and without advance notice where traffic appears to be illegal.

3.5 Personnel and recordkeeping

- Lucas Hoheisel, Managing Member, is responsible for administering this robocall mitigation program, for responding to traceback requests, and for maintaining the records described here.
- Call detail records sufficient to identify the originating subscriber, the originating IP address, and the session details of any call BHBB originates are retained for not less than 24 months and are available to support traceback.

- This program is reviewed at least annually in connection with BHBB's Robocall Mitigation Database recertification, and is updated whenever BHBB introduces a new voice product or materially changes its voice network.

4. Know-Your-Customer Procedures

47 CFR §§ 64.6305(d)(2)(ii) and 64.1200(n)(4)

4.1 All voice customers

- BHBB collects and records the customer's legal name, service address, billing address, email address, and contact telephone number before activating voice service.
- For business customers, BHBB records the legal entity name, legal address, billing information, and the name of the individual authorizing service, and verifies the business location during the onsite installation visit.
- Voice service is provided subject to BHBB's published Acceptable Use Policy, which is incorporated by reference into BHBB's Terms of Service and acceptance of which is a condition of ordering and continued use of the service. The Acceptable Use Policy prohibits use of BHBB voice service to originate calls in violation of applicable law, including the Telephone Consumer Protection Act and the Commission's rules thereunder; prohibits transmission of misleading or inaccurate caller identification information in violation of 47 U.S.C. § 227(e); requires that customers present only telephone numbers assigned to them by BHBB or documented as authorized for their use; and reserves BHBB's right to suspend or terminate voice service immediately and without prior notice where originated traffic appears unlawful or where necessary to respond to a traceback request.
- BHBB asks each business voice customer at onboarding whether it intends to place outbound calling campaigns, automated calls, or high-volume outbound traffic. Where the answer is affirmative, BHBB requires a written description of the campaign, the basis for called-party consent, and the number ranges to be presented, and may decline to provide service.
- Payment is collected from an identified account holder. BHBB does not accept anonymous or prepaid-instrument payment for voice service.
- Onboarding records are retained for the life of the account and for not less than two years thereafter. BHBB can identify the responsible subscriber for any call originated on its network from its call detail records.

4.2 Premises verification and endpoint integrity

- Voice service is activated only following an in-person installation by BHBB technicians at the customer's physical premises. BHBB verifies the service address at installation and records it with the account. This applies to on-net and over-the-top accounts alike.
- BHBB provisions and installs the customer premises equipment itself and retains the device identifiers for each endpoint in the account record.
- For over-the-top accounts, where transport is not provided by BHBB, BHBB records the registration IP address of each endpoint with the account record and retains it as part of the call detail information available to support traceback.

5. Know-Your-Upstream-Provider Procedures

BHBB does not accept call traffic for origination, transit, or termination from any upstream voice service provider, intermediate provider, gateway provider, or foreign provider. All traffic BHBB originates comes from its own retail end-user subscribers. BHBB therefore has no upstream providers in the sense contemplated by the rule.

BHBB obtains origination and termination services from 2600Hz, which act as its downstream carrier(s). Before entering into those arrangements, and on a continuing basis, BHBB:

- Confirms that each such provider has a current, non-delisted filing in the FCC's Robocall Mitigation Database, and re-verifies that listing at least annually.
- Maintains a written interconnection or wholesale services agreement addressing lawful use, calling identification accuracy, traceback cooperation, and the right to suspend traffic.
- Maintains named technical and legal escalation contacts at each such provider for traceback and enforcement matters, reachable outside business hours.

If BHBB in the future accepts traffic from any upstream provider, it will verify that provider's Robocall Mitigation Database listing before turn-up, apply contractual lawful-use and traceback obligations, and amend this description accordingly.

6. Call Analytics Systems

BHBB does not contract with any third-party call analytics vendor. Given the size of its subscriber base and the retail-only character of its voice service, BHBB performs analytics internally using the call detail records generated by its 2600Hz platform.

BHBB applies automated threshold rules and periodic manual review to the signals identified in Section 3.4 — outbound volume against account baseline, average call duration, answer-seizure ratio, destination diversity, and calls to invalid or unallocated numbers — and blocks or suspends traffic those rules identify as apparently illegal. Blocking of invalid, unallocated, and unassigned calling numbers and of Do-Not-Originate destinations is enforced in the call path as described in Section 3.3.

BHBB will engage a third-party analytics vendor if the scale or character of its voice traffic changes such that internal analytics are no longer adequate, and will amend this description and name the vendor if it does so.

7. Traceback Commitment

BHBB commits to respond fully and within 24 hours to all traceback requests from the Commission, from law enforcement, and from the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use BHBB's service to originate calls.

To that end:

- BHBB will register with the Industry Traceback Group and provide current contact information immediately upon its listing in the Robocall Mitigation Database, and will maintain that registration thereafter.

- Traceback requests are directed to Lucas Hoheisel, Managing Member, at hello@blackhillsbroadband.com and 605-206-9873. Hunor McCauley is designated as secondary contact to ensure coverage during absences.
- BHBB retains call detail records sufficient to identify the originating subscriber, the originating IP address, and the session details for any call it originates.
- On receipt of a traceback identifying traffic originated by a BHBB subscriber, BHBB will identify the subscriber, provide the requested information within 24 hours, investigate the account, and take enforcement action up to and including immediate suspension and termination of service.

8. Certification

The undersigned officer certifies that the foregoing describes the robocall mitigation program actually implemented by Black Hills Broadband LLC, that BHBB has taken reasonable steps to avoid originating illegal robocall traffic as described above, that BHBB commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate calls, that no prior certification of BHBB has been removed by Commission action, and that BHBB has not been prohibited from filing in the Robocall Mitigation Database. This certification is made in conformity with 47 CFR § 1.16 and is subject to the penalties for false statements under 18 U.S.C. § 1001 and 47 CFR § 1.17.



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Digitally signed by
<ldhoheisel@quicbb.net>
August 27, 2026 08:49 AM MDT

Lucas Hoheisel

Managing Member

Black Hills Broadband LLC

hello@blackhillsbroadband.com | 605-206-9873

Date: August 27, 2026



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BHBB-Robocall-Mitigation-Program-Description.pdf

Original SHA256:

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Result SHA256:

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Generated at: August 27, 2026 08:49 AM MDT

ldhoheisel@quicbb.net

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User agent: Mozilla/5.0 (X11; Linux x86_64; rv:153.0) Gecko/20100101 Firefox/153.0

Time zone: America/Denver

SIGNATURE FIELD 1



Event Log

August 27, 2026 08:48 AM MDT

Form viewed by ldhoheisel@quicbb.net

August 27, 2026 08:49 AM MDT

Submission started by ldhoheisel@quicbb.net

August 27, 2026 08:49 AM MDT

Submission completed by ldhoheisel@quicbb.net