

Network Communications International Corp.

Robocall Mitigation Plan

STIR/SHAKEN IMPLEMENTATION

Network Communications International Corp. (“NCIC” or the “Company”) is a voice service provider (“VSP”), providing Incarcerated People's Communications Services (“IPCS”) to correctional facilities throughout the United States. NCIC has fully implemented STIR/SHAKEN and has submitted its certification that all voice traffic originating on its network is authenticated with STIR/SHAKEN consistent with 47 C.F.R. §64.6301(a). NCIC has implemented a Robocall Mitigation Program (“RMP”) to include the obligations outlined in the Commission’s recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023). In compliance with the Report & Order, NCIC submits this RMP and certification into the Robocall Mitigation Database.

ROBOCALL MITIGATION

Background

The FCC Order requires that a RMP include the following affirmative obligations for voice service providers:

- Outline reasonable steps VSP has taken to avoid originating illegal robocall traffic;
- Commitment to respond 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 any illegal robocallers that use its service to originate calls;
- Know Your Customer procedures;
- Describe any call analytics system used to identify and block illegal traffic

Traceback:

The Company will commit to respond within twenty-four (24) hours to all traceback requests received from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocalls. NCIC maintains call logs and CDRs generated from its calling platform as well as stored call traces and CDRs from its SBCs which are used to aid in the investigation. NCIC has numerous law enforcement customers and regularly responds to law enforcement requests.

Traceback Contact Information

Name	Title	Contact Information
Randy Reeves	Platform Manager	Randy.reeves@ncic.com

Measures to prevent origination of illegal calls.

Know Your Customer:

The NCIC voice network is designed to serve individuals incarcerated in correctional facilities. All calls processed by the Company are OUTBOUND calls only, originating from correctional facilities located within the United States. As such, NCIC's services and network make it virtually impossible to originate unlawful robocalls. The security protocols of IPCS constitute reasonable steps to avoid originating such calls. Calls on NCIC's network must be manually initiated by incarcerated individuals on NCIC-owned and managed telephones that are located inside highly secure jails and prisons across the United States. In many correctional facilities, these originated calls are further secured and protected by programming logic that can only permit the initiation, routing and termination of calls to telephone numbers that are pre-authorized by correctional agency procedures. Incarcerated individuals using NCIC's IPCS platform are unable to auto-dial numbers or launch pre-recorded or artificial voice messages. In addition, NCIC does not enable end-users to use their own phone systems to generate robocalls. NCIC has multiple active systems to detect unauthorized use or breaches. These security measures, with which NCIC must and does comply, can reasonably be expected to significantly reduce the origination of illegal robocalls, as required by the Commission. Additionally, NCIC has a monitored email address where its connected carriers report any suspected fraudulent calls originating from the NCIC network. The Company does not serve end user customers, and inbound calls are not allowed.

Telephone Number Authorization:

NCIC has contracted with a third-party provider, Peerless Network, Inc. to terminate inmate-initiated calls, as well as obtain telephone numbers on NCIC's behalf. As such, NCIC has not needed to obtain an OCN, and thus does not meet the requirements to receive a SPC token under the current SPC Token Policy. NCIC understands that its underlying third-party providers have obtained the necessary SPC token and have implemented the various STIR/SHAKEN attestation levels discussed in the Second STIR/SHAKEN Order for inmate-initiated calls originating via NCIC's IPCS system.

Call Blocking:

The system is not designed to accept inbound calls. As a result, there is no requirement to monitor the RMD to identify calls coming from companies not registered in the Robocall Mitigation Database. For outbound calls, if an inmate makes a call to a party who no longer wants to receive calls from that inmate, the number can be added to a block list at the called party's request.

Analytics for Monitoring Traffic:

Calls are continuously monitored in real time to prevent the origination of illegal robocalls. The detailed reporting will assist in identifying suspected illegal calls and will send an alert if this type of activity is detected. No third party vendors are involved in the monitoring process.

CONCLUSION

The Company submits this Robocall Mitigation Program consistent with FCC Regulations, 47 C.F.R. §64.6305 (a)(1) & (d)(5). NCIC will update its submission in the RMD within 10 business days of any change to the applicable information it must provide in the RMD, including its Robocall Mitigation Program.