

Robocall Mitigation Plan Description for Columbus Communications Services

3/12/2025 Columbus Communications Services went live with Ribbon's SBCs. Ribbon is now our STI-CA using Ribbon's Call Trust. All calls are now checked.

1. Columbus Communications Services is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

- (a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023.

(2) For purposes of this paragraph (a), "small voice service provider" means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates).

2. Columbus Communications Services commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, within 24 hours and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. Columbus Communications Services has implemented Inteliquent's STIR/SHAKEN solution for authenticating calls on the IP portions of its network. For non-IP portions of the network, Columbus Communications Services has taken the following specific steps to detect originating robocall traffic:
 - (a) Columbus Communications Services requests identifying information from new and renewing residential and business customers to verify their identity and legitimacy. It also obtains a point of contact for each account to ensure that any issues can be resolved.
 - (b) Columbus Communications Services does not use its own call analytics, but instead obtains call traffic reports from its vendor, MACC, that provides information on any traffic anomalies that could be the result of illegal robocalling. Columbus Communications Services reviews these reports and determines whether there are legitimate reasons for the traffic anomalies and, if not, contacting the customer for an explanation and taking appropriate steps to prevent and mitigate any illegal robocalling up to and including termination of service.