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Thumb Cellular Robocall Mitigation Plan

Thumb Cellular has fully implemented STIR/SHAKEN on their network as well as actively carrying out a robocall mitigation program using TNS' Call Guardian Authentication Hub.

Reasonable steps taken to avoid originating illegal robocall traffic:

- Contracting with Transaction Network Services (TNS) for their Call Guardian Authentication Hub (CGAH) product that provides STIR/SHAKEN services and access to their Data Analytics web portal to proactively monitor traffic on our network. Also subscribing to TNS's DNO list service.
- Commit to respond 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.
- Vetting our new and renewing residential and business customers to ensure that use of our numbering resources is valid and legal. Processes: checking credit, requiring photo ID, and Terms & Conditions which prohibits illegal use of cellular service or devices.
- Encourage our customers to use the Do Not Call Registry and to educate them about robocalling and how to avoid scams and fraud.
- Establishing a single Point of Contact (along with backups) for our robocall mitigation program.
- Thumb Cellular currently accepts traffic from the following upstream providers:
 - Inteliquent/Sinch: Receiving incoming calls from the PSTN over SIP trunks with Inteliquent/Sinch. These calls are already signed by their originating carriers.
 - Verizon Wireless: Thumb Cellular has been part of Verizon's LTE in Rural America (LRA) program since 2011. Traffic is over Ethernet links and is two-way.
- Thumb Cellular does not operate as a tandem provider.
- Affirmative measures taken to prevent customers from originating illegal robocalls: fraud detection service, use of TNS Call Guardian Authentication Hub call analytics.
- Customers are subject to restrictions contained in the Terms & Conditions and Acceptable Use Policy. Its existing Terms & Conditions state that the customer may use the service for lawful purposes only and the services may not be used in violation of any applicable law or regulation. The Acceptable Use Policy further prohibits using the service for any illegal activity; transmitting large spam messages; or impersonating any other person or entity. In the Acceptable Use Policy, customers are notified that Thumb Cellular may take action up to suspension or termination of service for violations of the Acceptable Use Policy.

Regarding our place in the call chain, Thumb Cellular is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users on the IP-portions of its network.

We certify that Thumb Cellular has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.

Thumb Cellular's OCN is 6718.