

Robocall Mitigation Plan Description for Cunningham Communications, Inc.

1. Cunningham Communications, Inc. 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. Cunningham Communications, Inc. 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. Cunningham Communications, Inc. has taken the following specific steps to detect originating robocall traffic:

Cunningham Communications, Inc. requires new residential and commercial customers to provide multiple forms of identification prior to subscribing to new services. Cunningham Communications, Inc. uses software and hardware provided by TNS and MetaSwitch (TNS Call Guardian) to monitor its outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Cunningham Communications, Inc. if it originates any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation.

4. Cunningham Communications, Inc. has taken the following steps to prevent illegal originating robocalling traffic:

Cunningham Communications, Inc. has less than 3,000 voice subscribers. Most of its customers do not have the technical capability or access to their telephony service in such a way to allow them to change their caller ID from that which was assigned by the Cunningham Communications, Inc. provisioning staff. Cunningham Communications, Inc. has less than 10 customers with trunk groups where customers could originate calls and change their caller ID. These customers are long established local business customers in such fields as healthcare or manufacturing and that Cunningham Communications, Inc. is very familiar with. Cunningham Communications, Inc. applies filters to these trunk groups so that only prearranged telephone numbers it has confirmed are controlled and assigned to that customer are allowed to originate calls on these trunk groups.

5. Cunningham Communications, Inc. has taken the following steps to mitigate illegal originating robocalling traffic upon detection:

Cunningham Communications, Inc. processes call detail records and reviews monthly to confirm call volumes are comparable to previous reporting periods and investigates any large spikes in traffic. Cunningham Communications, Inc. also investigates any alerts from the TNS Call Guardian software to determine if the caller was attempting to originate unlawful robocalls. If Cunningham Communications, Inc. determines that the caller was attempting to originate unlawful robocalls, Cunningham Communications, Inc. will warn to stop them up to and including termination of service as appropriate.