

Acme Communications Inc. – OCN 1798

Robocall Mitigation Plan

1. Acme Communications Inc. is a small service provider serving fewer than 1,000 voice subscriber lines.
2. Acme Communications Inc. only provides service to end-user customers. We have no upstream customers.
3. Acme Communications Inc. commits to respond to all traceback requests from the Commission, Law Enforcement and the industry traceback consortium within 24 hours. Acme Communications Inc. will cooperate with such entities on a timely basis to investigate and stop any illegal robocallers that use our network to originate calls. If a customer of Acme Communications Inc. determines that their number has been spoofed and reports it to our staff, Acme Communications Inc. will initiate a traceback with the industry traceback consortium.
4. Acme Communications Inc. has taken the following steps to detect and avoid originating illegal robocalling traffic on our network as part of our Robocall Mitigation Program.
 - a. Acme Communications Inc. will use software provided by Ribbon Communications (a third-party analytic vendor) to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate 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. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their services.
 - b. All of Acme Communications Inc. long distance calls are handed off to Bandwith.com that has implemented a stir shaken policy
 - c. (1). Acme Communications Inc. knows its customers and follows the best practices for vetting caller identity as described in the NANC Call Authentication Trust Anchor Working Group as described below:

<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>

(2) Acme Communications Inc. will continue to examine residential and small business customers through normal business practices and will obtain a billing

address, a primary residence or a business location as well as obtaining a driver's license and or a tax identification number in order to obtain service.

(3) If a new or existing customer orders more than four phone lines, they will be contacted to determine the intended use of the lines. If it is determined that the lines will be used for illegal robocalls, we will refuse to initiate the lines. If it is determined that the lines are needed for legitimate calls, we will install the additional lines and put them on a "watch list" in case their business changes.

(4) Acme Communications Inc. has call detail records to determine typical call volume and potential reasons for significant deviations from a typical call volume. Acme Communications Inc. will determine if there are legitimate reasons for any customer to be making a number of high-volume short duration calls. Acme Communications Inc. will contact the customer within 24 hours of such deviations to determine if call volumes are legitimate.

5. Acme Communications Inc. is not a foreign voice provider.
6. Acme Communications Inc. has not been the subject of a Commission, Law Enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall mitigation Database certification or mitigation program.
7. Acme Communications has not been prohibited from filing in the Robocall Mitigation Database pursuant to any Law Enforcement action.