

Combined Public Communications, LLC

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Combined Public Communications, LLC ("CPC") to mitigate and eliminate illegal robocalling. CPC has an ongoing commitment to help alleviate illegal robocalling by working with other providers and regulatory agencies in combatting fraudulent voice activity.

CPC is an inmate communications service provider. Through various offerings, we assist incarcerated people to originate calls. CPC does not provide reseller or wholesale communications services to other communication companies. All telecom services are provided on a resale-only basis. As a telecom reseller, CPC is dependent on our underlying provider's assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Combined Public Communications, LLC has master service agreements in place with our underlying providers and has received written assurances from their officials that it has and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to CPC. CPC and its underlying providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

CPC is specifically an Inmate Communications Service provider. CPC contracts with County Governments and other entities to provide communications services to inmates and prisoners.

CPC processes phone traffic that is originated by an inmate using a CPC provided phone. CPC will not activate customers that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to CPC's strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with CPC. Individuals associated with prospects or current customers who have been known to be involved in fraudulent robocalling will cause their application to be rejected by CPC as a customer.

Traceback Requests

CPC is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. CPC will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Vicky Moody
Regulatory Officer
vmooddy@combinedpublic.com

Upon calling our dedicated Traceback Contact, an initial ticket is opened with Network Operations. This request is then routed to the switch operator and Management is notified. We can then identify calls and extract the logs in question.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation would be issued to the customer. If the fraudulent traffic is not remediated, CPC immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by CPC and/or obtained by CPC from CPC’s underlying carrier for use by the customer.

CPC does not lease or resell telephone numbers to retail or wholesale providers. CPC only makes calls to telephone numbers that inmates have explicitly dialed. Any telephone number that CPC uses is leased from a downstream long-distance carrier.

International Calling

CPC is not currently an international voice services provider. If at any time CPC does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a telecom reseller, CPC must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

CPC can and does monitor and examines call detail records (CDRs) to detect suspicious call activity and/or calling patterns. If we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating these calls so that we may take appropriate action. The actions taken may include but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's name; block the party's ability to originate calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

CPC Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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