

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, **CAS Communications, LLC.** submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **CAS Communications, LLC.** has in place to mitigate illegal robocalls as of June 30, 2023. **CAS Communications, LLC.** may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

STIR/SHAKEN Implementation

CAS Communications, LLC. will comply fully with all conditions set forth in the FCC's 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

CAS Communications, LLC. is implementing STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

CAS Communications, LLC. expects to implement this solution in the IP portions of its network by June 30, 2023.

- ☒ My traffic is fully attested.
- ☐ My traffic is partially attested.
- ☐ None of my traffic is yet attested, however I have implemented the Robocall Mitigation Plan outlined below.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. **CAS Communications, LLC.** is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and **CAS Communications, LLC.** has not received information suggesting that robocalls are originated on its network. Therefore, **CAS Communications, LLC.** does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence:

- **CAS Communications, LLC.** conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.
- **CAS Communications, LLC.** verifies customer's credit history and business reputation prior to providing service.
- **CAS Communications, LLC.** verifies customer information when contracts are renewed or services are added.
- **CAS Communications, LLC.** verifies the customer's identity and their right to use the telephone number presented on calls.
- **CAS Communications, LLC.** has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **CAS Communications, LLC.** has in place an enforceable terms of use and/or an acceptable use policy. **CAS Communications, LLC.** also has in place policies designed to detect and prevent fraudulent traffic on its network.
- **CAS Communications, LLC.** uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **CAS Communications, LLC.** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, **CAS Communications, LLC.** can suspend and/or terminate service to the customer.
- The IP portion of **CAS Communications, LLC.** network is STIR SHAKEN compliant. **CAS Communications, LLC.** has contracted with TNS to provide robocall analytics and reputation scoring of our networks TDM outbound traffic. TNS' analytics will identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls, as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. **CAS Communications, LLC.** has access to the TNS portal and receives notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. **CAS Communications, LLC.** will examine these notifications and investigate and identify the source of the calls as legitimate or unlawful.
- **CAS Communications, LLC.** blocks the following types of calls by default:
 - ☒ Calls originating from invalid numbers per FCC Order [2017 Call Blocking Order]
 - ☒ Calls from DNO numbers as per FCC Order [2017 Call Blocking Order]
- **CAS Communications, LLC.** also blocks the following types of calls:

- ✓ Network based security which blocks high risk IP's known for originating fraudulent SIP calls.
- ✓ Call barring rules for high risk and black listed international countries known for phone fraud

Responding to Traceback Requests

- **CAS Communications, LLC.** has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- **CAS Communications, LLC.** will respond promptly to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, **CAS Communications, LLC.** will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

CAS Communications, LLC. will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **CAS Communications, LLC.** will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

CAS Communications, LLC. has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. **CAS Communications, LLC.** is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Sincerely,



Chris Hildebrecht