



2021-06-21
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Mitigation actions
INSTITUTO COSTARRICENSE DE ELECTRICIDAD (I.C.E.)
COSTA RICA

From the document “Robocall Mitigation Database External Filing Instructions” downloaded from the following URL: <https://www.fcc.gov/sites/default/files/rmd-instructions.pdf>, in page number 8, there is option 3: “No STIR/SHAKEN” Implementation, which is the actual case for ICE. ICE would like to register this in FCC databases/records.

- ix. Select one of the three certification options from the “Certification” section of the form. These options describe various levels of STIR/SHAKEN implementation and the steps a Voice Service Provider must take if it is performing robocall mitigation.

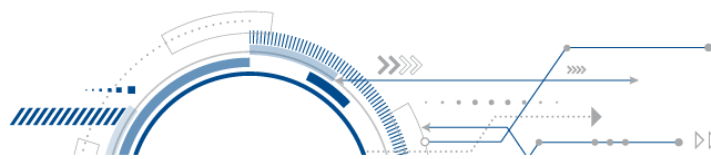
See Figure 10 below.

☐ Option 3: No STIR/SHAKEN Implementation – Performing Robocall Mitigation. The filer certifies that it commits 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, and that none of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and that all of the voice traffic that originates on its network is subject to a robocall mitigation program. The filer also certifies that the attached searchable PDF details the specific reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, the status of its implementation of STIR/SHAKEN across its entire network, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304.

Despite the fact that INSTITUTO COSTARRICENSE DE ELECTRICIDAD (ICE) at the moment does not has STIR/SHAKEN available in their network systems and/or platforms, it is important to mention that ICE networks does not allow “Identity impersonation”. ICE hardware and systems allows to perform and provide of call id of the originated calls base on the numbering range assigned and does not allowed that “User A” (MO) perform any kind of modification in the originating number.

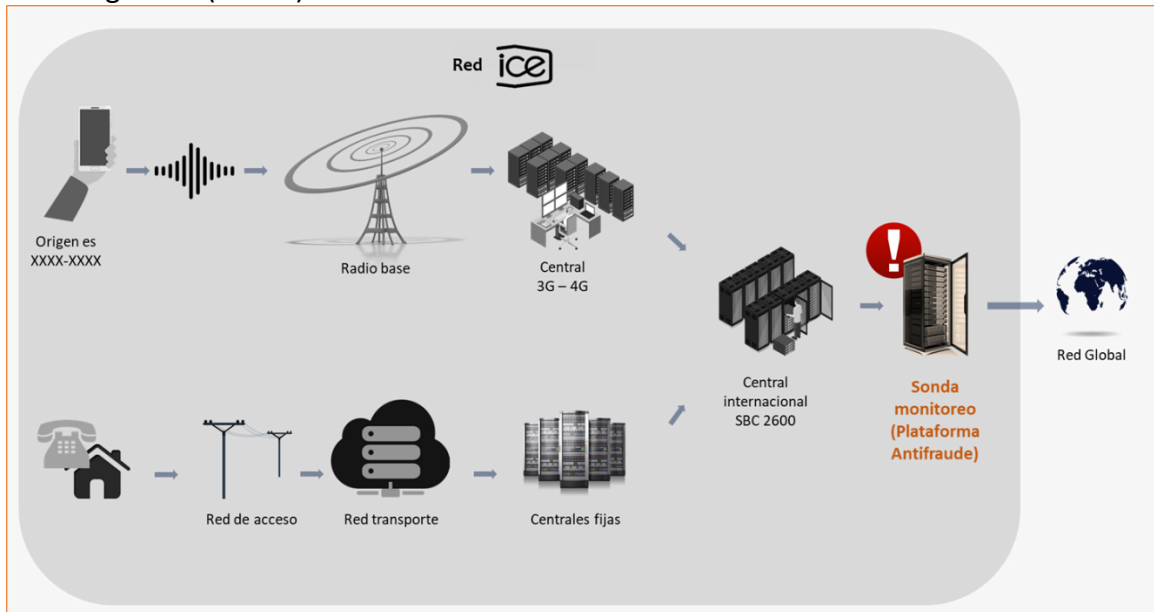
With regard to the affiliation process that ICE should perform at the FCC as “Voice service provider” it is noted that ICE provided an analysis of outgoing international traffic and it determines that ICE perform the following options to mitigate “Robocall” traffic.

-*Dirección de Protección y Seguridad Institucional (DPSI)-ICE-* has a probe equipment and a “Antifraud Platform” which allows real-time monitoring of all outgoing and incoming voice traffic of our networks. (attached topology un point of monitoring).





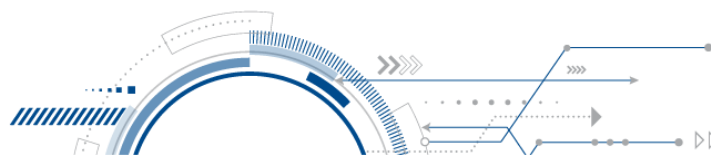
This system also analyzes the CDRs of the international outgoing traffic and examines if any of the “A Numbers” does not corresponds the authorize numbering plan provided by Costa Rica’s Telecom regulator (SUTEL).



The results of this analysis determines that the only non-ICE numbers (international) doing MOs to international destinations are those belonging to customers from other networks doing roaming in our network.

This means that ICE has taken security measures at different levels of the provisioning systems, mediation and billing, that only allows valid A numbers to route calls through our international core.

Furthermore, ICE has taken other actions against “Robocalls”. ICE is now working in design and analysis stage of a new process that will allow us to periodically verify random numbers of international traffic looking for non-authorized “A Numbers”, so ICE can guarantee that only those customers doing Roaming in our network the only ones performing international MOs through our network. This allows us to discard any possibility of spoofing scenarios which eventually could appear in our network.





Atentamente,

Negocios Mayoristas
International Carrier Relation &
Roaming Services

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Negocios Mayoristas

