



February 27, 2026

SUBMITTED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Subject: Implementation of Robocall Mitigation

Dear Ms. Dortch:

Cisco Systems, Inc. ("Cisco") submits this letter in support of Cisco's re-certification in the Federal Communications Commission's (FCC) Robocall Mitigation Database.

Overview of Services Provided by the Cisco Entities

Cisco is a United States-based multinational publicly traded company headquartered in San Jose, California. Cisco is the direct parent company of BroadSoft, Inc. ("BroadSoft") and IMImobile North America, LLC ("IMImobile") and the ultimate parent company of BroadSoft Adaption, LLC ("BroadSoft Adaption").

Cisco and its affiliates BroadSoft, BroadSoft Adaption, and IMImobile (collectively, the "Cisco Entities"), provide the following connectivity-based collaboration and meeting services to business customers: Webex Meetings, BroadSoft UC-One, Webex App, Webex Calling, BroadCloud Carrier and Webex Connect/IMI (the "Collaboration Services"). A subset of the Collaboration Services includes web-based conference and teleconference functionalities (the "Meeting Services"), while another subset of the Collaboration Services, including services provided in connection with Webex Calling, Webex Contact Center, and BroadCloud Carrier, constitute broader VoIP platforms which can be used by business customers to make or receive IP-based voice calls outside of a meeting context (the "Calling Platforms"). A third subset of collaboration services enables the delivery of short duration voice messages from business customers to designated recipients ("CPaaS").

Cisco Systems, Inc.
170 West Tasman Drive
San Jose, CA 95134-1706
Phone: 408 526-4000
Fax: 408 526-4100
www.cisco.com

Cisco Confidential



The Meeting Services

In providing the Meeting Services, Cisco procures numbering resources from third-party carriers ("PSTN Partners"), whitelists the numbers, and grants customers temporary access to the numbering resources (*i.e.*, the numbers are not permanently assigned to any customers). These numbers are used solely for the purposes of allowing business customers to dial-in to a web-based conference or teleconference. Cisco does not procure numbering resources to allow end users to initiate person-to-person communications via the PSTN outside of a teleconference. Moreover, Cisco lacks control over the network infrastructure necessary to implement STIR/SHAKEN with respect to calls initiated via the Meeting Services.

The Calling Platforms

The Calling Platforms are the only Cisco voice services that enable a two-way exchange between a calling party and a called party. However, the Calling Platforms are not replacements for PSTN service but are more properly understood as cloud PBX services. In most circumstances, Cisco sells its Calling Platforms to licensed service providers or resellers who enter into contracts with, deliver service to, and bill and collect fees from, end customers. In these instances, Cisco is not the service provider of record. In other instances, business customers may purchase certain of the Calling Platforms (*e.g.*, Webex Calling) in a bundle with PSTN resources. The PSTN resources are provided by BroadSoft Adaption. Similar to the Meeting Services use case, BroadSoft Adaption lacks control over the network infrastructure necessary to implement STIR/SHAKEN with respect to calls initiated via the Calling Platforms.

CPaaS

For CPaaS, Cisco and IMImobile deliver pre-recorded messages on behalf of business customers to recipients designated by the customer and may also include cloud PBX functionality. CPaaS does not enable the business customer and message recipient to engage in an active voice exchange. CPaaS calls are sent using numbering resources obtained from established PSTN Partners. Similar to the above use cases, Cisco lacks control over the network infrastructure necessary to implement STIR/SHAKEN with respect to calls initiated via the CPaaS offering.

Cisco Systems, Inc.
170 West Tasman Drive
San Jose, CA 95134-1706
Phone: 408 526-4000
Fax: 408 526-4100
www.cisco.com



STIR/SHAKEN Implementation

The Cisco Entities do not have a STIR/SHAKEN implementation obligation because they lack control over the network infrastructure necessary to implement STIR/SHAKEN. When an end user initiates an outbound call via the Meeting Services (e.g., to dial into a meeting), the Calling Platforms (e.g., to make a voice call), or the CPaaS offering (e.g., to deliver a pre-recorded message), the Cisco Entities send the call to a PSTN Partner, and the PSTN Partner routes the call to the PSTN. Cisco's PSTN Partners sign calls initiated via the Meeting Services and the CPaaS offering with the PSTN Partners' own certificates. Despite lacking control over the network infrastructure necessary to implement STIR/SHAKEN, BroadSoft Adaption has obtained a STIR/SHAKEN certificate, which the PSTN Partners use to sign calls that BroadSoft Adaption sends to them via the Calling Platforms. Cisco's objective in obtaining a STIR/SHAKEN certificate for BroadSoft Adaption is to support customer expectations about delivering calls with the appropriate attestation levels.

Know Your Customer Practices and Robocall Mitigation

The Cisco Entities' robust business practices and strong customer relationships enable them to determine each customer's identity. Enterprise customers are required to enter into a contractual agreement with the appropriate Cisco Entity. Prior to finalizing the agreement, customers are required to provide contact information which further enables the Cisco Entities to confirm their identity. The Cisco Entities' standard customer agreement includes contractual requirements to comply with applicable laws – including robocall mitigation requirements. Separately, Cisco's agreements with its underlying PSTN Partners also require compliance with applicable laws – including STIR/SHAKEN implementation or application of other robocall blocking or anti-fraud measures to Cisco traffic.

Cisco also employs proprietary monitoring tools to identify abnormal calling patterns (e.g., calls to high-cost countries or other destinations with a history of fraud). If Cisco detects an abnormal pattern, it investigates the calls and may warn the customer or suspend the customer's account depending on the severity of the suspicious activity.

Traceback Commitment

Cisco commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate

Cisco Systems, Inc.
170 West Tasman Drive
San Jose, CA 95134-1706
Phone: 408 526-4000
Fax: 408 526-4100
www.cisco.com



with these entities in investigating and stopping any illegal robocallers that use its service to originate, carry, or process illegal robocalls.

We trust that the approaches outlined above underscore our commitment to align with the FCC's efforts to combat robocalls. Please let us know if you require additional information or have any additional questions.

Very Respectfully,

A handwritten signature in black ink, appearing to read "M. Swedish", written in a cursive style.

Mariama Swedish

Vice President & Deputy General Counsel – Regulated Industries
Regulatory Affairs, Legal

Cisco Systems, Inc.
170 West Tasman Drive
San Jose, CA 95134-1706
Phone: 408 526-4000
Fax: 408 526-4100
www.cisco.com

Cisco Confidential