

**Amended Robocall Mitigation Plan of
Communications Global Network Services Limited (a BT company)**

Communications Global Network Services Limited (“CGNS”), a foreign voice service provider and non-gateway intermediate provider, submits this Amended Robocall Mitigation Plan to describe CGNS’ policies and procedures to address the issue of illegal robocalls using US NANP numbers. CGNS’ statements are based on its best information and belief. CGNS may change any of its policies or procedures referred to herein as it deems appropriate for its business needs and to further the goals underlying the Commission’s rules.

Company Background

CGNS is a wholly owned indirect subsidiary of BT Group plc, a UK-headquartered communications company that traces its roots to the Electric Telegraph Company incorporated in 1846. CGNS is the primary BT entity that carries traffic internationally from BT entities in the UK or elsewhere, or other carriers, for delivery to countries around the world, including the US, and is a “foreign voice service provider” as defined by 47 C.F.R. § 64.6300(c).

This registration includes international traffic carried by CGNS that may be known by the trade names BT and British Telecom or variants thereof, as well as EE, the mobile telephony provider operating under the BT umbrella of companies.

CGNS is affiliated with BT Americas Inc. (“BTA”), which is also a wholly owned indirect subsidiary of BT Group plc. BTA is the US operating entity providing Voice over Internet Protocol (“VoIP”) and private telecommunications services in the United States. BTA is also registered in the Commission’s Robocall Mitigation Database. CGNS and BTA are part of a coordinated BT-wide effort to mitigate unlawful robocalls and otherwise guard the trustworthiness of calls that BT carries.

STIR/SHAKEN Implementation

CGNS as a non-US carrier is not required to implement the STIR/SHAKEN regime in the international arena. Globally, CGNS and affiliated BT entities are engaging with industry and policymakers in a number of countries outside the US to develop solutions to reduce unwanted robocalls.

Robocall Mitigation Plan

CGNS, as a non-gateway intermediate provider, may deliver to intermediate or terminating carriers traffic that use North American Numbering Plan resources that pertain to the United States, and is therefore submitting this Robocall Mitigation Database filing pursuant to 47 C.F.R. § 64.6305(c).

In summary:

- CGNS performs due diligence of its customers (which include upstream providers) before contracting to provide services which may include credit checks, risk assessment, and other reviews.

- CGNS includes provisions in its customer contracts such as provisions requiring compliance with laws and regulations.
- CGNS, as part of a larger global BT/British Telecom family, guards against fraud by using a number of systems alarms, service monitors, and similar processes.
- CGNS utilizes highly trained employees to respond to evidence of unlawful calls and routinely blocks suspicious calls when indicated.
- CGNS prices its wholesale services into the United States in a manner that makes it less attractive than other options. This has the positive side effect of limiting scam and spam calls.
- CGNS is a member of the i3 Forum and Global Leadership Forum and their associated anti-fraud working groups, actively working to mitigate unlawful traffic.
- In addition, CGNS' parent, along with the UK telecommunications industry, have worked closely with the UK regulator to address the issue of illegal scams and frauds.

Cooperating with Traceback Requests and with State and Federal Regulators

CGNS is committed to responding to the extent permitted by applicable law in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. CGNS will also cooperate consistent with applicable law with such entities in investigating and stopping any illegal robocallers that use its service to originate or transmit illegal calls. CGNS has established robust processes for addressing such requests and commits to respond within 24 hours.