

Robocall Mitigation Plan - Communications Venture Corp d/b/a INdigital - parent company INdigital Holdings, Inc.

Know Your Customer

Communications Venture Corp d/b/a INdigital is a specialized Next Generation 9-1-1 provider serving 19 states in the US. These customers are units of state and local government, served by private, encrypted IP circuits in a Software Defined Wide Area Network (SD-WAN) meeting the National Emergency Number Association i3 V3 standards.

INdigital follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>.

Customer sizes vary from two telephone voice paths to 96 voice paths. All connections are via secure, encrypted transport circuits. In addition, we provide competitive local exchange service to certain of these customers using ported numbers from legacy incumbent providers.

Our largest customer has 96 voice channels (so they can place at most 96 simultaneous calls). All our customers are subject to an Acceptable Use Policy, 24-hour monitoring overseen by a 24-hour National Service Operations Center (NSOC). Alarm triggering is set to alert NSOC staff if significant or excessive number of calls and/or use an unusually large number of minutes.

Caller-ID for customers is assigned by our switch. INdigital either assign the Caller-ID or screen what they provide against a list of numbers we have assigned to their service.

Traceback Requests

INdigital will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

INdigital has never received a traceback request. If we do, we will respond immediately and investigate the source.

STIR/SHAKEN

INdigital has fully implemented STIR/SHAKEN to the extent practicable.

Some of the voice traffic we originate on our voice network is authenticated with STIR/SHAKEN. The remainder of the voice traffic that originates on our network is subject to the robocall mitigation program described in this document.

Robocall Mitigation Program (RMP)

INdigital uses software provided by our switch provider and a third party platform to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or the call source has a poor reputation.

INdigital immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.