



Robocall Mitigation Plan for Sorenson Communications, LLC and CaptionCall, LLC

Sorenson Communications, LLC (“Sorenson”) is a certified provider of video relay service (“VRS”). VRS is a form of Telecommunications Relay Service (“TRS”), which the FCC has said is not a telecommunications service or a VoIP service. Sorenson is not a Voice Service Provider as defined in 47 C.F.R. § 64.6301. It submits this Robocall Mitigation Plan (“RMP”) to prevent blocking or misidentification of TRS calls. VRS allows persons with hearing or speech disabilities who use American Sign Language (“ASL”) to use Sorenson’s endpoints to communicate with voice telephone users. A video link allows a communication assistant (“CA”) and the ASL user to view and sign with each other, and the CA is also connected to a user on the voice side of the call through a telephone. The CA interprets and relays the conversation back and forth between the two parties. VRS users can also make point-to-point video calls to other VRS users, wherein the VRS endpoint is used by individuals with speech or hearing disabilities to communicate directly with each other, without the assistance of a CA. Sorenson procures the NANP numbering resources necessary for VRS from local exchange carriers, and the telecommunications resources necessary to send and receive calls from the public switched telephone network from telecommunications carriers.

Sorenson’s wholly owned subsidiary, CaptionCall, LLC (“CaptionCall”), is a certified provider of Internet Protocol Captioned Telephone Service (“IP CTS”). CaptionCall, as a TRS provider, is also not a Voice Service Provider as defined in 47 C.F.R. § 64.6301. It also submits this RMP to prevent blocking or misidentification of TRS calls. IP CTS is used by persons with hearing loss who can speak and have some residual hearing. IP CTS allows the user to simultaneously listen to the other party and read the captions of what the other party in a telephone conversation is saying. IP CTS uses the Internet—rather than the telephone network—to provide the link and captions between the IP CTS user and the IP CTS service provider. Automated speech recognition technology, with or without the assistance of a CA, transcribes the non-IP CTS user’s words into captions for the IP CTS user to read. CaptionCall’s IP CTS can be used with CaptionCall’s captioning telephone or mobile application. The substantial majority of CaptionCall’s users directly procure their voice telecommunications service from a local exchange carrier or interconnected VoIP provider, which would be the entity responsible for STIR/SHAKEN implementation with respect to that user. For a relatively small percentage of CaptionCall users, CaptionCall procures an interconnected VoIP service from an underlying provider that CaptionCall then integrates into its IP CTS service.

STIR/SHAKEN Implementation Status

Sorenson is not a telecommunications carrier, provider of private telecommunications, or a VoIP provider, and thus does not have an FCC Form 499-A on file with the FCC. It therefore is unable to obtain a Service Provider Code (“SPC”) token under the Governance Authority’s revised SPC Token Access Policy. As a consequence, Sorenson is exempt from implementing STIR/SHAKEN. Sorenson has implemented the robocall mitigation plan described below. In addition, Sorenson has confirmed with its underlying NANP numbering resource providers,

Lumen and Bandwidth, that they will authenticate Sorenson's calls that originate on their respective systems and are subject to STIR/SHAKEN.

Although CaptionCall itself is an information service provider and does not provide the underlying voice service to the end user for most calls that it captions, it has implemented STIR/SHAKEN for the limited subset of users for whom CaptionCall procures and integrates voice connectivity. As described below, CaptionCall works with its underlying interconnected VoIP providers to authenticate calls that originate through those providers. In addition, CaptionCall has implemented the robocall mitigation plan described below.

Sorenson and CaptionCall exercise due diligence in contracting with underlying providers. Prior to contracting, it researches the nature of the provider's business and collects from each a Form W-9, that includes the provider's business name, type of entity, address, and taxpayer identification number. It also obtains a business contract for each provider so that it can immediately address any issues with the provider.

Know Your Customer Practices

FCC TRS rules require Sorenson, as a VRS provider, to review and submit the following registration information to the Telecommunications Relay Service-User Registration Database ("TRS-URD") for each user: (1) full name; (2) full residential address; (3) ten-digit telephone number assigned in the TRS numbering directory; (4) last four digits of the user's Social Security Number (or Tribal Identification Number); and (5) date of birth. In addition, Sorenson collects from each user a signed certification attesting that the user has a hearing or speech disability and understands that the cost of VRS is paid for by contributions from other telecommunications users to the TRS Fund. FCC TRS rules will require Sorenson to validate the eligibility of each call by querying the TRS-URD prior to the placement of a call, once the TRS Administrator notifies providers that it is ready for mandatory implementation of per-call validation.

Similarly, FCC TRS rules require CaptionCall, as an IP CTS provider, to collect, and, once the TRS-URD is operational for IP CTS, to submit the following registration information to the TRS-URD for each user: (A) full name; (B) full residential address; (C) telephone number; (D) a unique identifier such as the electronic serial number ("ESN") of the user's IP CTS device, the user's log-in identification, or the user's email address; and (E) the last four digits of the user's social security number (or Tribal Identification number). In addition, CaptionCall collects from each user a certification signed under penalty of perjury attesting, *inter alia*, that the user has hearing loss that necessitates the use of captioned telephone service and understands that the cost of captioning is funded through a federal program. Similar to VRS, FCC TRS rules will require CaptionCall to validate the eligibility of each call by querying the TRS-URD on a percall basis, although this requirement has not yet become operational.

Authentication For Calls that Originate on Sorenson/CaptionCall Systems and Subject to STIR/SHAKEN

For point-to-point calls between VRS users, Sorenson inserts a "p-asserted identity" in the user logs for calls that originate on its system. The p-asserted identity is a header field that is used among trusted SIP entities (typically intermediaries) to carry the identity of the user sending a SIP message as it was verified by the Authentication Service. This header is entered into a call's user log and ultimately accessed by the terminating service provider and the Verification Service. For voice calls to hearing users, the TRS-URD user registration and validation

requirements provide assurance to other providers that Sorenson knows the customer and that the customer has the right to use the associated telephone number. Sorenson has confirmed with/made arrangements with its underlying providers that such practices will enable the underlying provider to attach an A-level attestation into the SIP header for calls that originate on either company's system, and to transmit the call with authenticated caller identification information in the SIP header to the next provider in the call path.

While CaptionCall does not insert a p-asserted identity, it has confirmed with its underlying providers, Alianza (using Bandwidth.com as their phone number provider) and Flowroute, that they will attest to calls originated on their systems.

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls

Acceptable Use Policies

A customer's use of Sorenson's or CaptionCall's service is subject to an End User Licensing Agreement ("EULA") or Terms of Service ("ToS"). The EULA/ToS prohibits customers from engaging or participating in communications of an abusive, harassing, fraudulent, or unlawful nature while using Sorenson's or CaptionCall's equipment, systems, or services. Sorenson and CaptionCall reserve the right to terminate a user's service for violation of these prohibitions.

Monitoring Activities/Procedures for Identifying and Investigating Suspicious Activities

Sorenson and CaptionCall monitor calling patterns to identify potentially suspicious activities. Sorenson's monitoring practices detect unusual calling patterns, e.g., calls of limited duration and in excess of a prescribed number. If calling activity triggers Sorenson's monitoring practices, and where appropriate, Sorenson restricts a user's ability to place outbound calls (except to Customer Service or 911). With respect to IP CTS, there is a very limited subset of users for whom CaptionCall procures and supplies voice connectivity. For these users, CaptionCall relies on the fraud prevention and detection practices of its underlying providers. These monitoring practices look for spikes in traffic, excessive calling within a limited duration, and other indicia of unusual calling patterns. When such calling patterns are detected, further investigation is initiated, and a user's account may be disabled. Neither Sorenson nor CaptionCall use any third-party analytics vendors to identify and block illegal traffic.

Commitment to Respond to Traceback Requests and to Stop Illegal Robocallers

Sorenson and CaptionCall commit to respond fully and within twenty-four hours to all traceback requests received from the Commission, law enforcement, or the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use their respective services to originate such calls.

This Robocall Mitigation Plan describes the specific measures that Sorenson and CaptionCall have implemented as of the date of this submission. Sorenson and CaptionCall continually evaluate the efficacy of their measures to combat bad actors and take appropriate steps to improve these measures when needed. Certification as to Robocall Enforcement Actions

Within the past two years, none of Sorenson, CaptionCall or any entity with which they share common ownership, management, directors, or control has been the subject of a formal

Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.