

Central Michigan Communications Company ROBOCALL MITIGATION PLAN

Central Michigan Communication Company has implemented STIR/SHAKEN in the IP portion of its network, but still has some calls originating from the TDM (non-IP) portion of the network. Central Michigan Communication Company has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on the non-IP portions of the network as of 4/15/2021.

All calls that originate on Central Michigan Communications Company's network are subject to the described robocall mitigation program.

Central Michigan Communications Company has contracted with a vendor to provide robocall analytics and reputation scoring of our network's outbound traffic. The vendor's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Central Michigan Communications Company has access to the vendor's portal and receives weekly notifications about telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Central Michigan Communications Company also receive reports via e-mail alerts if any of its numbers experience a change in reputation such as suspicious traffic patterns or other detected anomalies outside the normal behaviour of our company's traffic. Central Michigan Communications Company will examine the reports and investigate and identify the source of the calls as unlawful or legitimate.

Enforcement

If it is determined a Central Michigan Communications Company customer is originating prohibited unlawful robocalls on our network, Central Michigan Communications Company will either warn the customer to stop or terminate their service as allowed per Central Michigan Communications Company policy.

Traceback

Central Michigan Communications Company is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.

Know your Customer

Central Michigan Communications Company has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Central Michigan Communications Company thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Customer Education

Central Michigan Communications Company will start posting information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocallers and a process to report complaints related to robocall activity.