

Zippytech LLC (OCN: 588A, 473E, 022J)
ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Zippytech LLC, d/b/a Cedar Networks (Zippytech) submits this updated report on its implementation of the STIR/SHAKEN call authentication framework and its robocall mitigation plan. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Zippytech has in place to mitigate illegal robocalls.

Zippytech is a small voice provider as defined by 47 CFR 64.6304(a)(2) and is covered under the continuing extension as defined in 47 CFR 64.6304(d) for Zippytech's non-IP traffic. Zippytech LLC utilizes Alianza as its underlying voice services provider, which has fully implemented STIR/SHAKEN. Therefore Zippytech relies on procedures, policies, and safeguards implemented by Alianza to ensure Zippytech's residential and business customers are sufficiently protected against robocall and spoofing activities. Zippytech is in the process of transitioning all of its voice customers to the Alianza platform, at which point Zippytech will update the Robocall Mitigation Database to reflect full implementation of STIR/SHAKEN.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

I. Know Your Customer

Zippytech is a small local provider that has established business relationships with its customers. Zippytech's customers all have a local presence in the market, and we perform the installation of service to their physical locations.

Zippytech has policies that define the circumstances by which it will deny, suspend or terminate service to a customer that includes making illegal calls.

II. Know Your Upstream Providers

Zippytech knows all the carriers from which it receives call traffic.

Zippytech has also confirmed that each of these carriers is listed in the Robocall Mitigation Database such that we are participating together for the goal of eliminating all Robocall traffic. Measures to Prevent or Avoid the Origination of Illegal Robocalls.

II. Acceptable Use Policy

Zippytech has in place terms of use that contain an acceptable use policy that prohibits illegal activities on its network. Customers are not permitted to make calls using telephone numbers not assigned to their accounts.

III. Call Analytics

Zippytech utilizes Robocall Mitigation Insights from Neustar, which allows Zippytech to monitor patterns and trends that may indicate illegal robocall traffic, which allow the company to take appropriate action in the event a customer violates the acceptable use policy.

IV. Traceback Requests and Cooperation with Authorities

Zippytech has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. Zippytech has provided the ITG with the contact information and business hours for those individuals.

Zippytech will respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

If a pattern of questionable activity is detected, Zippytech will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.