

Cloud5 Communications Robocall Mitigation Plan

Know Your Customer

We follow 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>)

Traceback

We 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.

STIR/SHAKEN Extensions

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use software provided by Sansay to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. We combine behavioral analytics, caller authentication and verification for:

Fraud Detection: Detection of high volume robocalling, spoofing and spam call activity.

Subscriber Notification: Caller ID Name override to warn subscribers of suspicious calls.

Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.

Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.

In addition, we have implemented a Call Abuse Policy and have notified our customers of the policy as copied below:

“Any call originated on the Cloud5 Communications network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the Cloud5 Communications network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”