

ROBOCALL MITIGATION PLAN

Celtic Communications is a systems integrator and reseller of both hosted voice applications and voice trunking services. As a downstream provider Celtic does not implement the STIR /SHAKEN protocols directly. Celtic is a switchless reseller and does not authenticate calls as we rely on and benefit from our upstream providers who are in compliance with the FCC's STIR/SHAKEN requirements. In addition, the voice trunking services provided by Celtic are terminated on secure networks that are managed and controlled by Celtic Communications.

Celtic Communications does not provide services to business that work in industries subject to robocall activity. All outbound traffic on Celtic Communication's voice trunking networks originate from predetermined IP addresses and using proprietary ports. Our upstream providers provide detailed call traffic pattern analysis reports that help us quickly identify robocall activity patterns if conducted on our customer trunks. Celtic Communications proactively monitors such reports and will advise customers if they are in violation of our terms of service which do not allow for robocall activity- high volume/short duration phone calls.

TRACED Act

Celtic Communications will comply with the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence" Act) and is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (Industry Traceback Group (ITG) designated as the FCC's enforcement bureau as the single registered consortium to lead and conduct private-led traceback efforts), and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Appropriate action will be taken to respond to any identified robocall violations including but are not limited to the discontinuation of service to the offender(s) on Celtic's network.

STIR / SHAKEN Exemptions

Pursuant to 47 CFR § 64.6304, "small voice service providers" are exempt from the requirements of 47 CFR § 64.6301 (Caller ID authentication requirements for voice service providers) through June 30, 2023. Celtic Communications currently meets the definition of a small voice service provider with less than 100,000 voice service subscriber lines.