

STIR/SHAKEN Implementation Status and Robocall Mitigation Plan

Introduction

Contoured Solutions is a Managed Service Provider (MSP) in the Southern California area providing information technology services to small and medium-sized businesses. In addition to IT consulting and support services, Contoured Solutions resells a variety of products and services to its customers including hardware, software, backup and disaster recovery and telecom services. For some telecom services, Contoured Solutions is simply a referral partner who receives regular commission for referring services to a major telecom provider (Spectrum, AT&T and TPX to name a few). For some customers, Contoured Solutions resells telephony via SIP trunks via our partner agreement with Bandwidth. In this capacity, Contoured Solutions is simply a reseller of SIP trunk services for Bandwidth and does not have any of its own telecom infrastructure. SIP trunk services are attached directly to our customers from Bandwidth and we bill those customers for service.

Robocall Mitigation

1. Traceback

- As Contoured Solutions is not actually a carrier and only a billing reseller for Bandwidth, if a traceback request is received, we agree to respond within 24 hours by submitting a ticket with our wholesale (Bandwidth) to assist. We will respond to all traceback requests from the Commission, law enforcement and industry traceback consortium.
- We shall similarly cooperate with traceback requests received directly from carriers, industry associates, law enforcement and other authorities.

Name	Contact Information
Contoured Solutions Telecom Fraud	(909) 529-6625
Department	Email: telecomfraud@cs-inc.us

2. Take Steps to Mitigate Illegal Traffic

- Contoured Solutions will continue to assist with mitigating suspected illegal activity when the Commission has notified it through its Enforcement Bureau.

3. Measures to Prevent the Origination of Illegal Calls

Know Your Customer

As of this writing, 85% of Contoured Solutions SIP trunk customers are current or former customers of its IT services. As such, validation of the legitimacy of the customer as a US-based business entity and their operations has been done prior to their ever having added SIP services. Potential customers inquiring about telephony service are validated by various research parameters including the age of their Internet domain, contacting their place of business/neighborhood businesses to ensure a valid physical address and online Internet searches regarding complaints lodged against them. Beginning in 2024, all telephony customers must provide detailed business information including, but not limited to, all business and trade names, parent company names, physical addresses, Federal Tax ID and Compliance Contacts.

Cease, Desist and Service Termination

Contoured Solutions issues cease and desist notices to customers whose traffic-origination practices violate laws, rules and terms and conditions. Contoured Solutions leverages its wholesale carrier, Bandwidth, to notify us should any suspicious traffic or call patterns be observed.

Internal Network Control Flags and Triggers for Mitigating Illicit Robocalling

STIR/SHAKEN IMPLEMENTATION:

Contoured Solutions wholesale carrier, Bandwidth, has fully implemented STIR/SHAKEN protocols on their networks. *Bandwidth's signing policies are:

- Outbound calls from Bandwidth customers using U.S. phone numbers in their account are signed with "A" or full attestation.
- Outbound calls from Bandwidth customers using phone numbers that are not in their account are signed with "B" or partial attestation.
- Bandwidth doesn't currently sign any calls with "C" or gateway attestation.

* <https://support.bandwidth.com/hc/en-us/articles/360025664313-What-is-STIR-SHAKEN-and-how-does-it-impact-robocalling>