



**COMPUTER SOLUTIONS INTERNATIONAL, INC. (“CSI”) FCC ROBOCALL
MITIGATION PLAN**

Business name and primary address:

Computer Solutions International, Inc.
3234 Mountain Cove
Salt Lake City, UT 84124

Other business names and names previously used: CSolutions.

CSI is not a foreign voice service provider.

Name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues:

Mr. Stephen Coleman
President
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CSI is a small provider of SIP-based business-class voice services in the Salt Lake City, UT area. CSI provides voice services to its customers by reselling the SIP trunking, DID's, and upstream inbound and outbound calling services of Bandwidth.com. CSI owns the single border session controller (“SBC”) which is used for all of its voice calling services.

CSI is not currently fully compliant with STIR/SHAKEN authentication program. However, it believes that it falls within the exemption of the full STIR/SHAKEN authentication rule at FCC Rules 64.6304(b) and 64.6305(d)(2)(i), 47 C.F.R. §§ 64.6304(b), 64.6305(d)(2)(i). Specifically, CSI lacks control over the network infrastructure of Bandwidth.com, which provides the SIP trunking, DID's, or upstream inbound or outbound calling services and facilities. However, CSI does own the SBC used for the voice service, as described above. Should the FCC determine it is necessary, CSI will obtain an SPC token and amend its Robocall Mitigation Plan and Certification accordingly.

CSI has implemented and complies with the following robocall mitigation program for its VoIP service:



- Know Your Customer: Prospective new voice service customers must speak with a CSI representative to order voice services; there is no mechanism allowing voice service initiation without that human touch. CSI obtains the name and physical location of all voice customers prior to initiating service. Given the small number of its voice customers, CSI knows its customers well and, to the best of its knowledge, all customers are legitimate businesses which do not engage in robocalling or any other form of illegal calling. CSI currently relies on Bandwidth.com's extensive prevention, monitoring, mitigation, and analytics procedures and practices to further mitigate the risks of illegal robocalling. See Bandwidth.com Robocall Mitigation Plan at: [Bandwidth Inc and Affiliates Robocall Mitigation Plan \(02.26.2024\).pdf](#).
- CSI has a an Acceptable Use Policy, which it has implemented, stating that it is unacceptable for CSI customers to transmit any data that violate any federal or state laws or regulations.
- Know Your Upstream Provider: CSI connects to the Public Switched Telephone Network through the third-party SIP origination/termination service provider, Bandwidth.com. According to the FCC's Robocall Mitigation Database, Bandwidth.com is fully compliant with STIR/SHAKEN and so only accepts network traffic from carriers that are in the Robocall Mitigation Database. See, [Robocall Mitigation Database Form - Robocall Mitigation Database \(servicenowservices.com\)](#). Further, CSI is contractually obligated to comply with Bandwidth.com's Acceptable Use Policy, which prohibits use of the Bandwidth.com's service for any purposes that would be deemed unlawful or in violation of any government regulations. See, <https://www.bandwidth.com/legal/acceptable-use-policy/>. Further, for redundancy and as a backup-only provider, CSI has contracted with Twilio to provide upstream inbound/outbound calling transport if Bandwidth.com's service is unavailable. According to the FCC's Robocall Mitigation Database, Twilio is also fully compliant with STIR/SHAKEN. See - [Robocall Mitigation Database Form - Robocall Mitigation Database \(servicenowservices.com\)](#).
- CSI's voice customers can only use telephone numbers obtained from CSI to originate and terminate telephone calls.
- CSI shall respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

No prior CSI robocall certification has been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database.



At no time in the prior two years has CSI been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to CSI transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing or a deficient Robocall Mitigation Database certification or mitigation program description.

Respectfully Submitted,

/s/

Stephen Coleman
President
Computer Solutions International, Inc.