

CCID Application FCC RMD Filing Addendum

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Document Overview

This document provides documentation for the United States Federal Communication Commission (FCC) and the Robocall Mitigation Database (RMD) filing for the Mobile Heartbeat Application “Custom Caller ID” (CCID).

It outlines the workflow, security, tracking, and auditability of the application usage.

1. The CCID Application

1.1. Functionality / Usage workflow

The CCID application is used by Mobile Heartbeat customers, healthcare organizations, tied into an application running on mobile devices with cell service.

It provides the ability to make a call using a custom caller ID of the user's choice at the time of placing the call. The implementation is in form of a relay and bridge, managed by our central application. All calls are initiated by a person, no "robo functionality".

The telecom-relay vendor of the call-relay functionality is Bandwidth.com.

The CCID Cloud hosted application (our application) is hosted with Microsoft Azure.

Example of Typical Usage: A doctor wants to call a patient, but does not want to expose the actual cell phone number, an alternate caller ID, such as that of a hospital or doctors office, is chosen before the call is place.

1.2. Implementation / Technical workflow

The mobile device application (Apple IOS or Google Android) is tied to a central application managed by Mobile Heartbeat and the Healthcare organization. The technical workflow of placing a "CCID-Call":

- User logs in to the application using credentials managed by the Healthcare organization
- Mobile app verifies user details and present a user interface
- User opens dialer to make CCID call, chooses a caller ID and clicks call
- The mobile application talks to the central system
- The central system
 - Authorizes the user/call
 - Sets up a time limited allowance for call completion with the Cloud hosted application
 - Tells the mobile application what number to dial to initiate the relay setup
- The mobile application calls the relay number given by the central system
- The telecom relay system
 - Receives the call
 - Contacts our Cloud hosted application for authorization, caller id, and destination
 - Receives the destination from our cloud application
 - Calls the destination, setting caller id
 - Bridges the two calls

1.3. Application Security

In short: All calls are made from authenticated persons, and logged in traceable formats.

- The CCID application can only be utilized from a Mobile Heartbeat mobile application
- Mobile Heartbeat mobile application cannot be used by the public. It can only be utilized by customers with a platform setup tied into their system, and their active users.
- A customer system authenticates and authorizes user by credentials issued and managed by the health care organization (Typically Active Directory).
- Most of the Healthcare organization utilize MDM for mobile device application distribution
- Every login is verified in real time to the Healthcare organizations login mechanism
- A user of this platform logs in to the application using credentials strictly controlled by the health care organization

1.4. Robocall Mitigation Information

- Many calls will have Shaken/STIR enabled on the first leg of the call, as they typically come from a cell phone.
- The telecom-relay system may at some point provide Shaken/STIR functionality on the second leg of the call, the status of this is not yet known.
- With the uncertainty of Shaken/STIR availability, we make sure we can utilize application logs and data to drill down to actual persons should the need arise:
 - The central application back end will log all calls initiated, with data on who the user is in the Healthcare organization
 - The cloud hosted application will log all calls initiated, with from and to numbers
 - The telecom-relay providers will have call logs of incoming and outgoing calls