



Overview

JohnsonCN is a small entity providing voice service. JohnsonCN provides services to local small businesses for their non-automated, person-to-person voice needs and does not install any system that facilitates robocalls.

Role in the Call Chain

JohnsonCN is a voice service provider with an obligation to implement STIR/SHAKEN on the IP portions of its network. We do not provide non-IP services.

STIR/SHAKEN Implementation

JohnsonCN fully complies with the FCC's mandate regarding the implementation of the STIR/SHAKEN framework.

JohnsonCN implements STIR/SHAKEN through its underlying provider.

Our exclusive connection to the telephone network is through ANPI Business LLC, operating under the *Vitality* name (hereafter *Vitality*). Vitality and its affiliates are registered with the Policy Administrator and are authorized providers within the STIR/SHAKEN framework, in partnership with TransNexus as the STI-Certificate Authority (STI-CA).

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Vitality assesses calls for JohnsonCN and assigns a level A certification. Our configuration with Vitality ensures that only level A/B certified calls are passed into our portion of the call chain.

Vitality has implemented the STIR/SHAKEN authentication framework across its entire network, ensuring all calls it originates comply with 47 CFR § 64.6301(a)(1) and (2).

Vitality employs Neustar and First Orion as third-party vendors for additional call analytics.

All traffic between JohnsonCN and its customers is fully protected and authenticated using industry best practices. All traffic between JohnsonCN and Vitelity is fully protected and authenticated using industry best practices.

Call Analytics

In addition to analytics provided by our upstream provider as described above, JohnsonCN monitors outbound voice traffic to prevent the origination of illegal robocalls. Our software provides detailed reporting to identify suspected illegal robocalls and alerts us if any such calls originate. If we determine that a caller attempted to initiate unlawful robocalls, we either warn them to stop or terminate their service, as appropriate.

In a similar way, JohnsonCN also monitors inbound calls. We offer tools and filters that customers can use to mitigate inbound robocalls, including access to STIR/SHAKEN attestation information. JohnsonCN customers are provided with an automated system to screen unknown incoming calls.

Know Your Customer - New and Renewing Customers

JohnsonCN follows best practices for vetting caller identity, as described by the NANC Call Authentication Trust Anchor Working Group.

Our policy is to serve only local, Washington State-licensed small businesses that engage exclusively in person-to-person communication. We verify customer provided information through on-site visits to the customer's business location.

JohnsonCN includes prohibited traffic language in all contractual agreements with its customers and retains contractual rights to terminate services for violations of relevant laws, including the Telephone Consumer Protection Act. We require our customers to sign a contract with us that the systems are not to be used for outward phone marketing or robocalls.

Know your Upstream Provider

JohnsonCN has confirmed that our upstream provider is listed and in good standing in the Robocall Mitigation Database (RMD). JohnsonCN has also reviewed the provider's RMD entry to understand how they monitor originating traffic to mitigate illegal robocalls and protect our portion of the call chain.

Our vendor has incorporated traceback and prohibited traffic language in all contractual agreements with us.

JohnsonCN policy is that we explicitly only will use providers listed in the Robocall Mitigation Database and they must be in good standing with a complete and full STIR/SHAKEN implementation across all its offerings.

Risk Assessment

JohnsonCN customers do not originate high-volume calls, and we have not received any information suggesting robocalls have originated on our network. JohnsonCN does not install any system that facilitates robocalls. We do not offer Text or SMS services nor are such services activated. JohnsonCN maintains its and its customers systems up to date with security patches and following industry best practices to help mitigate unauthorized access.

Therefore, we do not consider our network to be at high risk of originating illegal robocalls.

Rate Limits

JohnsonCN has implemented rate limits within our system to typical office usage. If needed for safety reasons we have systems and procedures in place to allow temporary expanded limits, such as for school closure notification.

Our rate limits do not pertain to 911/988, or emergency calls as described later in this document.

Traceback/Inquiries

JohnsonCN promptly responds to inquiries from law enforcement and regulators, including the FCC, Federal Trade Commission, state attorneys general, the industry traceback consortium, and our provider seeking traceback or similar information.

We commit to:

- Responding fully and timely to traceback requests.
- Providing responses within 24 hours to inquiries from the Commission, law enforcement, and the registered traceback consortium.

We cooperate fully and timely in investigating and stopping any illegal robocalls originating from our service.

911/988/Public Safety Care

We explicitly exempt 911 Emergency and 988 Suicide and Crisis Lifeline numbers from our outbound rules and limits.

We take reasonable efforts to ensure that we do not block calls from public safety answering points or government emergency numbers.

RMD Filing / Investigation History

JohnsonCN has not been prohibited from filing in the Robocall Mitigation Database and has not been involved in any recent formal law enforcement or regulatory investigations regarding unlawful robocalling. However, JohnsonCN acknowledges that on December 10, 2024 it was directed by the Federal Communications Commission to cure its Robocall Mitigation Database (RMD) entry certification to include newly-required information. JohnsonCN is currently curing its entry in the RMD. No final determination has been issued.