

C9 Operations LLC (www.c9voip.com) has implemented the following detailed mitigation program plan.

1. C9 Operations LLC is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines and therefor qualifies for an extension until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads: §64.6304 Extension of implementation deadline. (a) Small voice service providers. (1) Small voice service providers are exempt from the requirements of §64.6301 through June 30, 2023. (2) For purposes of this paragraph (a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all the provider’s affiliates).
2. C9 Operations LLC commits to respond to all trace back requests from the commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
3. C9 Operations LLC blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, known numbers not allocated to a provider and numbers not assigned to a C9 Operations subscriber or otherwise set aside for outbound call use.
4. C9 Operations LLC validates outbound callees by database of known extension matching the valid NANP number assigned to customer lines for all originating calls. Non-validated calls are marked as unauthorized and are not permitted on our network.
5. Furthermore, Customers of C9 Operations LLC voice services are not allowed any method to control or change their caller ID functionality. Any attempt to change or augment caller ID at the User-Agent client software level will be superseded by the database validation process before the call is allowed to progress. All calls not originating from a validated number are blocked by default.
6. C9 Operations LLC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. C9 Operations thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.
7. Furthermore, C9 Operations LLC does not allow clients to use Auto-Dialer or computer based automatic outbound dialing technology on our network.
8. If it is determined a C9 Operations customer is originating prohibited unlawful robocalls on our network, C9 Operations will first warn the customer to stop and then terminate their service if they do not comply.

9. C9 Operations LLC actively monitors network traffic and CDR records for any anomaly or unauthorized behavior and promptly suspends any traffic matching these monitoring efforts and alerts the customer for confirmation and explanation of suspended traffic or remediation if proper explanation is not provided.
10. C9 Operations LLC is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls.
11. As a member of the NTCA we are actively investigating and working on a non-IP based authentication solution.
12. We are actively following the processes outlined here in this mitigation program plan