

Multi-Point Communications, LLC

Robocall Mitigation Plan

STIR/SHAKEN IMPLEMENTATION

Multi-Point Communications, LLC (“Multi-point” or “Company”) is a small voice service provider and is therefore exempted from requirements of 47 CFR 64.6301 through June 30, 2023, per 47 CFR 64.6304 — Extension of implementation deadline. Further, Multi-Point is a reseller without control of the network infrastructure necessary to implement STIR/SHAKEN protocols and is therefore exempted, but Multi-Point is cooperating with its wholesalers to ensure that its calls are trusted.

ROBOCALL MITIGATION

The FCC has three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

Traceback:

If the Company receives a subpoena and has access to the call history, the Company provides the information to the respondent. If the Company does not have access to the call history, the Company will contact its underlying carrier/partner and request that the call history be provided.

Steps to Mitigate Illegal Traffic:

The Company has an Acceptable Use Policy in its agreements with customers to prevent SPAM calls.

Measures to prevent origination of illegal calls:

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address. The Company verifies the identity of customers prior to allowing them to obtain service and numbers.

The Company will rely on its carrier partners to give notice if robocalls are detected.

The Company will work with its wholesale service providers to block calls originating from its customers if necessary due to fraudulent activity. The Company will issue a request to the wholesale carrier to block illegal calls.

AFFIRMATION

Multi-Point Communications, LLC submits this robocall mitigation plan to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187). This plan is a work in progress and will be supplemented as the company gains more exposure to and experience with these protocols.