

FCC Communications Remediation Plan

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FCC Communications Remediation Plan

1.0 Executive Summary

A critical deficiency was identified in our process for handling communications from the Federal Communications Commission (“FCC”). We identified missed emails, particularly those requiring prompt action to maintain certification and led to a revocation from the Robocall Mitigation Database.

This remediation plan (“Plan”) establishes new procedures for receipt of both emails and phone calls (including voicemails) and utilizes our internal Ticketing System as a central tracking system to ensure all FCC-related correspondence is systematically monitored, triaged based on urgency and type, clearly assigned to appropriate stakeholder/owner, tracked against deadlines, resolved efficiently, documented accurately, and escalated appropriately.

2.0 Problem Definition & Root Cause Analysis

Problem: Critical emails from the FCC were missed or delayed in processing.

Consequence: Potential revocation of certification due to failure to respond within mandated timelines, demonstrating non-compliance.

Likely Causes (Addressed by this plan):

- Lack of dedicated monitoring system for emails/calls from FCC (fcc.gov).
- Absence of well-defined rules and procedures for handling FCC communications.
- Insufficient triage mechanism to determine email/phone call priority.
- Inadequate tracking of communications against response deadlines.
- Potential lack of accountability or follow-through without a monitoring system.

3.0 Immediate Actions

3.1 Reinstate Communication Monitoring:

The responsible individual(s)/team must immediately check the FCC's Public Notice database and any other relevant repositories for outstanding notices related to our entity/registration (e.g., deadlines, orders requiring action).

Verify if there are any ongoing or recent processes that might have been missed during the downtime. Document all findings.

3.2 Draft & Communicate New Standard Operating Procedures (SOPs):

Develop clear, concise SOPs based on this Plan for handling FCC communications.

Distribute these SOPs immediately to all relevant stakeholders (e.g., legal team, compliance officer, designated contact points).

3.3 Set Up Ticketing System Workflow:

Create a dedicated project in Ticketing System ("FCC Compliance & Communication").

Configure the Ticketing System workflow as described below in Section 4. This must be done urgently.

3.4 Establish Initial Contact with FCC:

Initiate contact with the FCC via their established channels to explain the situation, request reinstatement of certification processing rights and addition to the Robocall Mitigation Database status review, if applicable. Document any communication in Ticketing System.

4.0 New Process Using Ticketing System

The Ticketing System process will cover both incoming emails and phone calls/voicemails related to FCC communications.

4.1 Monitoring & Identification:

4.1.1 Emails:

Set up an automated email filter on all relevant accounts (primary user, compliance officer, legal team members). The filter will automatically forward all emails addressed from fcc.gov to our Ticketing System upon receipt.

Criteria: Sender address contains fcc.gov. Also monitor primary FCC contact accounts if different ones exist.

Action: If forwarding, the email is immediately marked as "New Ticket" in Ticketing System. Users must open a ticket manually using specific subject line keywords or flags (e.g., "Certification," "Notice of Violation," "Penalty," etc.) and select the appropriate project and priority.

4.1.2 Phone Calls/Voicemails:

Any phone calls or voicemails from the FCC should be documented as a New Ticket in the Ticketing System.

Action: All incoming calls identified as FCC-related must trigger an immediate action within the defined timeframe. This involves:

Listening carefully to the voicemail/reading voicemail transcription.
Logging the call as a New Ticket in the Ticketing System immediately (as per Section 5.2).

4.2 Triage:

Assign a single point of contact ("POC") or use designated triage rules for initial assessment within 8 hours.

All New Tickets for email issues and call issues created in the Ticketing System must be moved to "Triage" status. The stakeholder/owner responsible for triage is typically a Compliance Officer or Legal Specialist.

4.2.1 Priority Levels:

Highest: Direct order requiring immediate action, imminent deadline, legal threat, complaint filed against us by the FCC.

Need immediate attention (within minutes/hours).

Assigned to Senior Legal/Compliance Lead or Executive Director directly if needed.

Includes: "Order," "Urgent Action Needed," "Deadline in X hours/days," "Legal Threat."

High: Significant notice requiring a response within specific short deadlines (e.g., 30 days), potential violation, technical request needing prompt attention but not an order.

Needs assignment and action tracking by end of next business day or first available window.

Assigned to Lead Compliance Specialist/Legal Counsel.

Medium: Standard correspondence requiring a response within longer standard FCC timelines (e.g., 60 days), informational requests, updates needing review but no immediate deadline.

Needs assignment and tracking for scheduled action.

Assigned based on defined roles/priorities (e.g., Junior Legal/Compliance Specialist).

Low: Very low urgency notifications, routine inquiries with ample time to respond (>60 days typically).

Can be assigned slightly lower priority but still needs tracking and response assignment.

4.2.2 Triage Criteria:

1. Sender (FCC Office involved - e.g., Wireline, Wireless, Public Notice Bureau, etc.)
2. Subject Line keywords (e.g., "Notice," "Action Required," "Violation").
3. Content urgency/keywords ("ASAP," "immediately," specific deadline dates/timestamps).
4. Nature of the request/inquiry.

4.3 Assignment:

Based on triage assessment, assign each issue to the most appropriate team or individual with defined responsibilities (see Section 5 for roles). Use Ticketing System's built-in assignment features.

4.4 Resolution & Tracking:

The assigned owner must work on the issue within the agreed timeline. Update the Ticketing System ticket with all actions taken, decisions made, correspondence sent, and dates/times.

4.4.1 Mandatory Fields: Issue Type (Email / Call), Priority, Summary, Description (raw transcript or details from email/call log).

4.4.2 Deadline Tracking:

Critical deadlines must be explicitly noted in Ticketing System tickets. Use date fields for mandatory response dates.

Implement automated reminders and escalations:

- Notification 14 days before deadline.
- Automated escalation if resolution isn't started by a specific time (e.g., end of business the previous day).

4.4.3 Response Documentation:

All responses generated must be clearly documented in the Ticketing System, including who responded, what was said, and the date and time. This includes emails sent back or phone calls made to FCC offices.

Maintain records for audit purposes.

5.0 Process Execution Steps

Step 1: Receipt & Auto-Trigger:

Email from FCC triggers a New Ticket in the Ticketing System.

Step 2: Initial Logging:

New Ticket will include basic details of the email including sender information.

Step 3: Triage:

Assigned to designated POC. Within 8 hours of email or call: triage must occur, priority must be assigned, and disposition shall be determined.

Step 4: Assignment:

Based on triage, the ticket will be assigned to appropriate owner(s) with defined responsibilities.

Step 5: Work In Progress (WIP):

Owner will take action according to the nature of the communication and required response timeline and will update the Ticketing System ticket with applicable notes on a continuous basis.

Step 6: Deadline Management:

Automated reminders will be sent to stakeholders as deadline approaches. If nearing deadline, issue will be escalated to a higher priority level requiring more urgent attention.

Step 7: Resolution & Record Keeping:

Owner(s) complete assigned actions (drafts response, prepares documentation, responds to communications), and documents such actions in the Ticketing System.

Step 8: Review & Closure:

After appropriate review (if required by process), the Support Ticket will be marked as resolved.

6.0 Roles and Responsibilities

FCC Communications POC (Triage Role): Responsible for initial assessment of all incoming FCC communications. The POC could be a specific Compliance Officer or Legal team member or a combination of both who are designated for this task.

Issue Stakeholders/Owners: Primarily legal counsel, compliance specialists, technical leads as defined in Ticketing System assignments. Clear ownership ensures accountability.

Ticketing System Administrator (Optional but recommended): Sets up and maintains the Ticketing System project structure, rules, workflows, and permissions.

Regular Reviewer/Manager: Periodically reviews the FCC Comms Ticketing System project for aging issues, compliance with procedures, and overall health.

7.0 Escalation Policy

Define clear escalation paths:

A Support Ticket will be escalated

If an issue is not triaged within 8 hours.

If resolution isn't started within 8 hours (after assignment).

If deadline compliance seems unlikely.

7.1 Escalation Levels:

To the assigned owner's manager/Compliance Lead after 8 hours.
Then to the Senior Legal/Executive Director if deadlines are critical and initial escalation fails.

8.0 Reporting

Generate regular reports from Ticketing System:

Compliance Report: Shows all FCC communications handled vs. expected volume; highlights any delays or issues nearing deadline.

Status Report:

Tracks the status of ongoing processes mentioned in emails.

9.0 Training

Conduct mandatory training sessions for all personnel involved once the new Ticketing System project is fully configured and SOPs are drafted.

Explain FCC communication channels (email, phone) and their importance.
Detail on how to interact with the Ticketing System ("FCC Comms" project).

10.0 Technology Implementation

10.1 Email Forwarding: Configure email client filters to forward emails from FCC automatically to the Ticketing System.

10.2 Ticketing System Automation:

Leverage Ticketing System automation extensively:

1. Auto-create issues from emails/calls.
2. Assign to triage role upon creation.
3. Send reminders based on deadlines/priorities.
4. Escalate if not updated/acted upon.

11.0 Audit & Compliance

Regularly audit the Ticketing System "FCC Comms" project against established procedures and response timelines for FCC requirements. This helps catch any missed communications proactively. Ensure all actions taken are documented correctly in the Ticketing System.

12.0 Contingency Plan

For Email Forwarding Failure: Designate a secondary manual check process using a rotating schedule or daily dedicated time to review @*.fcc.gov emails, even if automated forwarding fails temporarily. This prevents backlogs.

For Phone Call Issues: Ensure multiple people are trained on the designated number and understand their responsibility for logging calls promptly.

13.0 Review & Refinement

This Plan will be reviewed quarterly (or more frequently as needed) with key stakeholders to ensure it remains effective, is followed consistently, and adapts to any changes in FCC procedures or communication patterns.