

Computer Services & Solutions, Inc. (CSSI)

Robocall Mitigation Plan

FCC Robocall Mitigation Database Support Document

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1. Provider Description

Computer Services & Solutions, Inc. (CSSI) operates as a non-facilities-based reseller of interconnected VoIP services. CSSI provides SIP trunking and hosted VoIP services to business customers through upstream carriers and underlying providers, including VoIP.ms and Vitelity.

CSSI does not own or operate switching facilities, session border controllers, or direct PSTN interconnection facilities used to perform STIR/SHAKEN authentication.

2. STIR/SHAKEN Status

CSSI has not implemented STIR/SHAKEN authentication because it does not maintain operational control of the network infrastructure necessary to independently implement STIR/SHAKEN functionality.

CSSI relies on upstream providers to perform network-level STIR/SHAKEN authentication on traffic routed through their networks.

CSSI maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a).

3. Robocall Mitigation Program

CSSI maintains procedures designed to prevent the origination and transmission of unlawful robocalls, unlawful spoofing, and abusive voice traffic.

Mitigation measures include:

- Customer vetting and Know Your Customer (KYC) procedures prior to activation of voice services.
- Collection and maintenance of customer identification and contact information.

- Prohibited-use policies restricting unlawful robocalling, spoofing, fraud, and abusive traffic activity.
- Review of suspicious traffic patterns, traceback notices, carrier complaints, and abuse reports.
- Cooperation with upstream providers regarding suspicious or unlawful traffic.
- Suspension or termination of service when unlawful activity or misuse is identified.

CSSI also reviews the status of upstream providers to confirm they maintain active Robocall Mitigation Database filings where required.

4. Traceback Cooperation

CSSI commits to respond fully and within twenty-four (24) hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium.

CSSI will cooperate with authorized traceback investigations and provide responsive information available to CSSI, including customer account information and call detail records where applicable.

5. Prior FCC Compliance Matters

In 2024 and 2025, the FCC identified deficiencies in CSSI's Robocall Mitigation Database filings relating to documentation, certification accuracy, and mitigation plan disclosures. CSSI responded to Commission staff, reviewed its compliance procedures, and submitted revised mitigation plans and updated RMD filings.

On August 25, 2025, CSSI was listed in Appendix A of FCC Order DA-25-737 and temporarily removed from the Robocall Mitigation Database due to filing deficiencies. CSSI implemented corrective actions and was provisionally reinstated on September 26, 2025.

In 2026, CSSI further updated its RMD certification and disclosures to accurately reflect that upstream providers perform STIR/SHAKEN authentication functions on traffic routed through their networks and to ensure consistency between its mitigation plan and FCC certifications.

These matters involved compliance documentation and certification issues only and did not involve findings of illegal robocalling, unlawful spoofing, consumer harm, or intentional misconduct.

6. Ongoing Compliance

CSSI will maintain and update this robocall mitigation program as necessary to remain accurate and consistent with FCC requirements.

CSSI will update its RMD filing within the time required by FCC rules following material changes to required filing information and will complete annual recertification requirements as required by the FCC.