

Robocall Mitigation Program
Consensus Cloud Solutions, LLC

Prepared pursuant to Second STIR/SHAKEN Report and Order, FCC 20-136

Consensus Cloud Solutions, LLC (“Consensus”) is dedicated to stopping illegal calls from originating in Consensus’s network and monitoring the faxes coming into its network, in accordance with FCC regulations.

Consensus certifies that it has and will continue to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

Consensus certifies that it will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate faxes.

Consensus certifies that all traffic which originates on its network is subject to this robocall mitigation program.

Consensus certifies that as part of its robocall mitigation efforts, it is taking these specific reasonable steps to avoid originating illegal robocall traffic:

1. Consensus accepts requests to add or remove any phone numbers to its internal Do Not Call list. Consensus blocks contact to numbers on its Do Not Call list.
2. Consensus investigates inquiries from its carriers regarding suspicious activity, including looking into the validity of the account and customer information. If the validity is questioned, the account is suspended or closed.
3. Consensus is a wholly owned subsidiary of Consensus Cloud Solutions, Inc, which publishes and maintains terms of service available here: [Terms of Service | Consensus](#). The terms of service permits Consensus to terminate service to any Customer that violates the Terms of Service and immediate termination if Customer violates its Legal Compliance Obligations.

Consensus certifies that it is not required to comply with STIR/SHAKEN because it lacks control over network infrastructure necessary to implement STIR/SHAKEN. See Report and Order, WC Docket 17-97, released March 31, 2020 at paragraph 40. Nonetheless, Consensus expects that all originating calls will be signed by its wholesale carriers who are fully STIR/SHAKEN compliant.

Customer Due Diligence: Consensus conducts due diligence on new customers utilizing a fraud prevention tool via Signifyd and additional internal rules using a scoring system when determining if a customer will be approved, challenged or denied. Currently, Consensus has over 200 rules in place to validate customer confidence. Additionally, Consensus has policies that define the circumstances by which it will deny, suspend or terminate service to a customer, which includes detecting unusually high usage patterns.

Plan updates: This Robocall Mitigation Plan will evolve to respond to the constantly changing practices and techniques that are used to detect and prevent illegal robocalling. Consensus will continue to monitor industry best practices and improve its internal processes to ensure that this Robocall Mitigation Plan is current. In the event of any material change to this Robocall Mitigation Plan, Consensus will submit such update to the FCC’s Robocall Mitigation Database.

Sincerely,



Vithya Aubee, VP, General Counsel and Secretary
Consensus Cloud Services, LLC