

Lightning Telecom LLC

Robocall Mitigation Program

Lightning Telecom LLC is telecommunications service provider located in Brooklyn NY. We only have commercial accounts. We service 1458 lines across 172 companies.

Type of Extensions Received Under 47 C.F.R. §64.6304

Lightning Telecom has received the following types of extensions of the STIR/SHAKEN implementation deadline under 47 CFR § 64.6304, as we have under 100,000 lines.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps Lightning Telecom has taken to avoid originating illegal robocall traffic.

1. *Know-Your-Customer Policy*: Lightning Telecom vets the identity of its customers in order to prevent bad actors from utilizing its network. Lightning Telecom confirms the identity of new business customers by collecting information such as their physical location, contact person(s), state or country of incorporation, and the nature of the customer's business before activating new service or making changes to existing services.
2. Lightning Telecom monitors call analytics to identify and block calls with invalid identifiers that are suspected of illegal, fraudulent or abusive habits. We follow the best practices for vetting caller identity.

3. *Terms of Service:* Lightning Telecom has posted its Terms of Service on the company's website, which states that voice service customers that are identified as violators of the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act will potentially be subject to enforcement actions by the FCC, appropriate law enforcement, and termination of service.
4. Lightning Telecom will respond within 24 hours to any Traceback requests from the Traceback Consortium. We will comply with those requests in a reasonable time frame.
5. In addition, any customer that Lightning Telecom identifies as originating robocalls will be contacted, their toll records investigated, and potentially have their service terminated if corrective measures are not taken to eliminate future issues. The FCC's Enforcement Bureau would also be contacted for appropriate action to be taken against the offending subscriber.