



CueTel Robocall Mitigation Plan (RMP)

Executive Summary

The goal of this plan is to prevent the incidence and impact of robocalls across CueTel's network, enhancing customer satisfaction and trust, and ensuring compliance with legal standards and industry best practices.

1. Assessment and Objectives

Current State Analysis: CueTel customers generally do not originate high volume calls and CueTel has not received information suggesting that robocalls are originated on its network. Therefore, CueTel does not consider its network at high risk of originating illegal robocalls.

Regulatory Compliance: CueTel responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, as well as cooperates with such entities in investigating and stopping any illegal robocalls fully and within a 24-hour period.

Customer Experience Improvement: CueTel aims to enhance customer trust and satisfaction by effectively mitigating robocalls.

2. Technology Implementation

STIR/SHAKEN Status: CueTel has fully implemented STIR/SHAKEN framework across its network to authenticate caller IDs and mitigate call spoofing. This is facilitated by a STIR/SHAKEN server hosted, monitored, and maintained by VI Communications, a Sangoma Company. A unique Sansay (STI-CA) certificate is applied to sign and certify calls leaving CueTel's network. As of June 23, 2023, all CueTel voice traffic is fully attested (Attestation Level A).

Call Blocking and Filtering: CueTel utilizes CNAM services from VI Communications which includes robocall mitigation by leveraging behavioral analytics, caller authentication and verification, and detection of fraudulent calls. CueTel is actively blocking calls originating from invalid numbers, calls from Do Not Originate (DNO) lists, and calls with a SPAM score above 79.

3. Customers and Support

Know Your Customer (KYC): CueTel maintains a direct relationship with each of its customers. Potential customers interested in doing business with CueTel must provide legal documentation or verifiable evidence to prove authenticity. A review is conducted to confirm the customers' legitimacy.

Suspicious Activity: If CueTel has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem immediately (within 24-hours) and if effective action is not taken, suspend and/or terminate service to the customer.

Support: Customers can report unwanted calls using the following channels: by phone, email (ticket creation), website chat, or SMS/MMS. CueTel manages unwanted calls for all customers as needed, upon request, and when required at no additional cost.

Customer Control: Customers can blacklist callers using feature codes or the Address Book by setting a contact type to “blacklist,” empowering them to manage unwanted calls.

4. Monitoring

Continuous Monitoring: CueTel reviews call traffic daily, across all customer domains, to identify irregularities and take immediate action if/when required. CueTel also monitors call failures for SIP responses that may indicate a flagged number or caller authentication problem.

5. Collaboration and Compliance

Industry Collaboration: CueTel regularly engages with its software vendors and upstream service providers to understand products, services, and technological advances to continuously refine robocall mitigation efforts.

Legal and Regulatory Updates: CueTel subscribes to the FCC’s Daily Digest, to stay informed about Commission orders, news releases, speeches, public notices and all other FCC documents that are released each business day.

6. Plan Review and Update

Regular Review Cycle: CueTel has established a quarterly review schedule of the Robocall Mitigation Plan to assess its effectiveness and make necessary updates.

Feedback: CueTel invites feedback from customers and industry partners to improve the plan.

Conclusion

CueTel's Robocall Mitigation Plan is designed as a living document that evolves in response to new challenges, regulatory changes, and technological advancements. By prioritizing customer experience, leveraging advanced technologies, and fostering industry collaboration, CueTel is leading in the fight against robocalls, ensuring a secure and trustworthy communication environment for all its customers.