

Securus Technologies, LLC
Robocall Mitigation Plan
V.1 February 2024

STIR/SHAKEN IMPLEMENTATION

Securus Technologies, LLC (“Securus” or “Company”) is a voice service provider (“VSP”), providing inmate calling services (“ICS”) to correctional facilities throughout the United States. Securus has fully implemented STIR/SHAKEN and on March 30, 2023 submitted its certification that all voice traffic originating on its network is authenticated with STIR/SHAKEN consistent with 47 C.F.R. §64.6301(a). Securus has implemented a Robocall Mitigation Program (“RMP”) to include the obligations outlined in the Commission’s recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023). In compliance with the Report & Order, Securus submits this RMP and certification into the Robocall Mitigation Database.

ROBOCALL MITIGATION

Background

The FCC Order requires that a RMP include the following affirmative obligations for voice service providers:

- Outline reasonable steps VSP has taken to avoid originating illegal robocall traffic;
- Commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls;
- Know Your Customer procedures;
- Describe any call analytics system used to identify and block illegal traffic

Traceback:

The Company will commit to respond fully and within twenty-four (24) hours to all traceback requests received from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocalls. Securus maintains call logs and CDRs generated from its calling platform as well as stored call traces (Klerity/Ativa) and CDRs from its SBCs which are used to aid in the investigation. Securus has numerous law enforcement customers and regularly responds to law enforcement requests.

Traceback Contact Information

Name	Title	Contact Information
Eric Williamson	Sr Director of Telecom	Eric.williamson@securustechnologies.com

Measures to prevent origination of illegal calls.

Know Your Customer:

The nature of Securus' services and network make it virtually impossible to originate unlawful robocalls. The security protocols of ICS constitute reasonable steps to avoid originating such calls. The Securus voice network is custom designed to serve individuals incarcerated in correctional facilities. Calls on the Securus network must be manually initiated by incarcerated individuals on Securus-owned and managed telephones that are located inside highly secure jails and prisons across the USA. In many correctional facilities, these originated calls are further secured and protected by programming logic that can only permit the initiation, routing and termination of calls to telephone numbers that are pre-authorized by correctional agency procedures. Incarcerated individuals using Securus's ICS are unable to auto-dial numbers or launch pre-recorded or artificial voice messages. In addition, Securus does not enable end-users to use their own phone systems to generate robocalls. Securus has multiple active systems to detect unauthorized use or breaches. These security measures, with which Securus must and does comply, can reasonably be expected to significantly reduce the origination of illegal robocalls, as required by the Commission. Additionally, Securus has a monitored email address where its connected carriers report any suspected fraudulent calls originating from the Securus network. The Company does not serve end user customers, and inbound calls are not allowed.

Telephone Number Authorization:

All outbound calls utilize numbers that are registered to Securus. These numbers are secured directly by the Company. Securus has their own OCN (841J), has registered with the STI-PA, and has their own token that they use to sign all outbound calls originating from the facilities they serve.

Call Blocking:

The system is not designed to accept inbound calls. For outbound calls, if Securus identifies any illegal calls originating from one of the correctional facilities they serve, they immediately notify the correctional facility as well as the appropriate law enforcement agency. Securus reserves the right to suspend traffic if it suspects illegal calls or robocalls are being generated from the facility.

Analytics for Monitoring Traffic:

Securus SBCs and switches monitor in real time the outbound voice traffic to prevent the origination of illegal robocalls. These SBCs and switches provide detailed reporting which help identify suspected illegal calls and will send an alert if this type of activity is detected. No third-party vendors are involved in the monitoring process.

CONCLUSION

The Company submits this Robocall Mitigation Program consistent with FCC Regulations, 47 C.F.R. §64.6305 (a)(1) & (d)(5). Securus will update its submission in the RMD within 10 business days of any change to the applicable information it must provide in the RMD, including its Robocall Mitigation Program.