

Robocall Mitigation Plan for Atos Public Safety, LLC

Pursuant to 47 C.F.R. § 64.6305, Atos Public Safety, LLC (“**COMPANY**”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **COMPANY** has in place to mitigate illegal robocalls as of February 26, 2024.

COMPANY reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

BACKGROUND

COMPANY is a Delaware limited liability company with operations in several states and is a Non-Gateway Intermediate Provider.

COMPANY operates Emergency Services IP Networks (ESInets) which receive calls originated by 9-1-1 callers and connect them to public safety answering points (PSAPs).

IMPLEMENTATION

COMPANY will comply fully with all conditions set forth in the FCC’s applicable orders, rules, and policies regarding the implementation of the STIR/SHAKEN framework for Non-Gateway Intermediate Providers.

As of February 26, 2024, except for the occasional transfer of existing emergency services from one PSAP to another, there are no calls originated in **COMPANY**’s network. **COMPANY** does not deem STIR/SHAKEN implementation necessary to reasonably avoid originating illegal robocall traffic. **COMPANY** is committed to responding to and investigating any concern of illegal use of its service to originate robocalls.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that **COMPANY** has implemented to detect and prevent illegal robocalls on its network as of February 26, 2024. **COMPANY** will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should **COMPANY** determine that changes are appropriate, its practices may differ from those described below.

COMPANY’s network is purpose-built to handle incoming 9-1-1 calls. The only functionality in **COMPANY**’s network available to originate a call is specific to functionality that transfers an in-progress 9-1-1 call from one PSAP to another PSAP. In **COMPANY**’s evaluation, there are no call originating services within its network which could be used to generate illegal robocalls. As

new features are added to COMPANY's Next Generation 9-1-1 system, re-evaluations of originating call service will be performed.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

- Except for functionality to transfer in-progress 911 calls, COMPANY does not provide its customers with originating call services.
- COMPANY uses analytics technologies or services to monitor traffic on its networks and identify potentially unlawful call origination activity. Logs of calls on COMPANY's networks can be analyzed to support an investigation of illegal robocall activity.
- COMPANY provides incoming call blocking functionality to its customers who, at their own discretion may choose to use it.

COOPERATION WITH STATE AND FEDERAL REGULATORS

COMPANY will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, COMPANY will:

- Respond to written requests for information about illegal robocalls; and
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls.