

Communications Management Services LLC

Caller ID Authentication Plan

Updated February 26, 2024

Introduction. Communications Management Services LLC (“CMS”),¹ pursuant to Sections 64.6301 and 64.6305 of the Commission’s rules, 47 C.F.R. §§ [64.6301](#), [64.6305](#) and the Commission’s “Best Practices”² as amended³ adopts this Caller ID Authentication (“Plan”). This Plan is current as of its submission date and may be subject to change as necessary to further comply with amended Commission regulations and requirements.

Exemption. CMS falls under a plain language definition of a Small Voice Service Provider serving less than 100,000 voice service subscriber lines, pursuant to Section 64.6304(a)(2) of the Commission’s rules, [47 C.F.R. § 64.6304\(a\)\(2\)](#), albeit lacks control over network infrastructure necessary to implement STIR/SHAKEN.⁴ CMS is currently incapable of obtaining a Service Provider Code (“SPC”) token due to Governance Authority policy and is exempt from the requirements of [Section 64.6301](#) until it is capable of obtaining a SPC token as set forth in Section 64.6304(b) of the Commission’s rules, 47 C.F.R. § 64.6304(b). As a non-facilities-based service provider, CMS must defer to its underlying carriers regarding interconnection with upstream providers, and its underlying carriers’ analytics to block illegal traffic that may originate with upstream providers.

Commitment. Pursuant to Section 64.6305 of the Commission’s rules, 47 C.F.R. § [64.6305](#), CMS commits to take all such *reasonable steps* to avoid originating illegal robocall traffic and shall include a commitment to respond fully and in a timely manner 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. As set forth below, CMS has adapted the North America Numbering Council Call Authentication Trust Anchor Working Group’s *Best Practices for the Implementation of Call Authentication Frameworks*⁵ into its Plan.

¹ FCC Form 499 Filer ID 836047 issued in 2023.

² *Call Authentication Trust Anchor*, WT Docket No. 17-97 *Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices*, WC Docket No. 20-324, *Wireline Competition Bureau Issues Caller ID Authentication Best Practices*, DA 20-1526 (December 22, 2020)

³ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17- 97, *Sixth Report and Order*, *Fifth Report and Order*, *Order on Reconsideration*, Order, FCC 22-37 (May 20, 2022) and *Call Authentication Trust Anchor*, WC Docket No. 17-97, *Sixth Report and Order*, FCC 23-18 (March 17, 2023).

⁴ *Call Authentication Trust Anchor*, *Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, *Report and Order and Further Notice of Proposed Rulemaking*, 35 FCC Rcd 3260 (Mar. 31, 2020) (First Caller ID Authentication Report and Order and Further Notice), para. 40.

⁵ *Public Notice*, WC Docket Nos. 17-97 and 20-324, DA 20-1526, Appendix B (December 22, 2020)

Company Contact. The name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues is as follows:

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Corporate Information. CMS is a newly formed provider of IP-enabled services and limited TDM Analog telecommunications services. CMS operates exclusively as a non-facilities-based Small Voice Service Provider as defined, with a STIR/SHAKEN implementation obligation directly serving end-users as set forth herein. CMS is not a foreign voice service provider, is not an intermediate or gateway provider, does not serve subscribers who are physically located outside of the U.S., and does not act as a wholesale provider originating calls on behalf of another provider or providers. CMS does not maintain an operating company number and does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

CMS certifies that it has not been prohibited from filing in the Robocall Mitigation Database. CMS certifies further that it has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing. And CMS certifies that at no time during the prior two years, has CMS been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Reasonable Steps to Prevent Robocalling.

Subscriber Vetting

CMS fully vets all subscribers before providing service to the subscriber. CMS obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. Further, CMS compares information provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. Subscribers are served under a service agreement.

CMS monitors its subscribers' traffic for call, originating number and terminating number irregularities in conjunction with its underlying carriers, and should irregularities be determined, will immediately contact the subscriber as part of its investigatory process. CMS does not grant, nor can it grant, right-to-use telephone number resources.

Telephone Number Validation

For new subscribers, CMS will assign telephone numbers to the account, unless the account has ported from another subscriber. CMS will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic. For toll-free numbers, CMS will verify the underlying ten-digit number and ensure that only calls from the assigned numbers may originate calls.

Network Traffic Monitoring, Analysis and Investigation.

Consistent with its commitment above, CMS will respond fully to all traceback requests from the Commission, law enforcement, and the industry traceback consortium as soon as possible and at no time exceeding 24 hours from the time of the request, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

CMS coordinates with its underlying carriers to monitor CMS's subscribers' traffic, identify traffic anomalies including, but not limited to, unusually high call volumes to different telephone numbers and disparate geographic areas, over the course of one or more hours, for which CMS will investigate, and to immediately block subscriber service if robocalling is suspected. Confirmation of illegal activity and more than one violation will result in immediate service termination.

Refusing Traffic from Unlisted Providers.

In conjunction with its underlying carrier, CMS refuses to accept traffic from unlisted and de-listed providers from the Commission's Robocall Mitigation Database.

Ongoing Robocall Mitigation.

CMS has implemented Transnexus Corp.'s ClearIP suite of products to ensure full Robocall mitigation for all call traffic, inbound and outbound is routed through this environment.

CMS anticipates that its Plan will evolve as it makes Plan enhancements, as underlying carriers enhance their own plans, and as the Trust Anchor and industry generally gain experience in caller ID authentication protocols.

[Signature on following page.]

CMS avers to update its plan within ten business days from the date of any Plan changes.

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/s/ Michael Pratt

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