

Cordova Long Distance, Inc. (CLD) provides long distance service on a resale basis, and is thus considered a non-gateway intermediate provider under Federal Communications Commission (FCC) rules. CLD, as a long-distance reseller, is not under an obligation to implement STIR/SHAKEN pursuant to the *Second Caller ID Authentication Report and Order*, 36 FCC Rcd 1859, 1868, para. 19 (2020) as it lacks control over the network it uses to provide service.

Robocall Mitigation Plan

CLD monitors its network to assure quality of service and detect anomalous traffic.

CLD is committed to respond to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocalls that use its service to originate calls on a timely basis.

CLD has procedures in place to prevent new and renewing customers from using its network to originate illegal robocalls. CLD thoroughly vets new residential and business customers to the fullest extent possible to ensure that use of its numbering resources is valid and legal. CLD does not allow new services to be connected over electronic notification such as email or fax only; all new connects must be made over the phone or in-person for residential accounts.

CLD has implemented a “know your upstream provider” process that includes exercising due diligence prior to accepting traffic from such providers. This process includes, but is not limited to, collecting information from upstream providers such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the upstream provider’s business. If and when necessary, CLD will take additional steps, such as adopting contract terms and conditions that allow termination of the traffic exchange in the event the upstream provider attempts to use CLD’s network to carry or process a high volume of illegal traffic.

CLD encourages its customers to use the Do Not Call Registry and to educate them about robocalling and how to avoid scams and fraud.

CLD has an enforceable terms of use policy in place and will enforce the terms to prohibit the use of telephone numbers for illegal purposes by disconnecting customer's services and reporting the telephone numbers to the appropriate agencies.

CLD has established a single Point of Contact for our robocall mitigation efforts. Please visit our website www.goCLD.net/robocall to notify us of a potential robocall originating from our network.

CLD implemented Call Guardian with MetaSwitch and TNS; it provides an end-to-end call authentication solution that fully satisfies the STIR/SHAKEN requirements.