

Consumer Cellular Robocall Mitigation Plan

Consumer Cellular, Incorporated (“Consumer Cellular”) submits this Robocall Mitigation plan document (“Document”) as required by 47 CFR §64.6305. Consumer Cellular is an MVNO and it does not control any network infrastructure, as such it does not have an obligation to implement STIR/SHAKEN. Consumer Cellular’s underlying network service providers are responsible for the implementation of STIR/SHAKEN and for network-based call blocking.

As an MVNO that does not control network infrastructure, Consumer Cellular does not interface with upstream providers nor is it able to implement analytics to identify and stop illegal robocalls. However, Consumer Cellular utilizes reputable underlying providers and ensures that those providers are complying with reasonable robocall mitigation practices.

Consumer Cellular’s underlying providers are registered in the Robocall Mitigation Database. They have implemented STIR/SHAKEN on the IP-portions of their networks and they have robust analytics in place to identify and block illegal robocalls on the underlying service provider networks.

For example, Consumer Cellular’s underlying service providers each have a Robocall Mitigation Program on file that describes the robust robocall monitoring programs used to identify and block illegal robocalls on the service provider network. These programs, which both utilize a broad set of data to determine whether a call is likely to be illegal, are highly effective in identifying suspect calls. The underlying service providers utilize data analytics and fraud teams to look for new patterns that are indicative of illegal robocalls and are always seeking ways to further improve their illegal robocall detection processes.

If an underlying provider determines that one of Consumer Cellular’s customers is engaged in illegal robocalling or spoofing, Consumer Cellular’s agreements allow it to terminate or restrict that customer’s service.

Additionally, Consumer Cellular takes reasonable steps to ensure that its customers are not originating illegal robocalls. Consumer Cellular checks the identity of its postpaid subscribers as part of the service initiation process. As recognized in the Best Practices for the Implementation of Call Authentication Frameworks, “[r]esidential and small business retail End-Users (i.e., mass market Customers) present a low risk for perpetrating illegal robocalls.”¹ Consumer Cellular’s postpaid mass market customers are required to provide government-issued identification or comply with other risk-based authentication controls to identify the customer prior to service initiation. If Consumer Cellular cannot validate the identity of the customer based on the initial information provided, Consumer Cellular may require additional information to validate the consumer. Consumer Cellular does not have prepaid or wholesale customers.

Consumer Cellular’s customers are prohibited from abusive, fraudulent, or unlawful use of any Consumer Cellular services. If a Consumer Cellular customer is using Consumer Cellular’s service for

¹ See Best Practices for the Implementation of Call Authentication Frameworks, NANC Call Authentication Trust Anchor Working Group, Appendix A of Public Notice, Wireline Competition Bureau Issues Caller ID Authentication Best Practices, WC Docket Nos. 17-97 and 20-324, DA 20-1526 (rel. Dec. 22, 2020).

abusive, fraudulent, or unlawful or purposes, Consumer Cellular's wireless service agreement allows it to terminate service to that subscriber. Also, if a customer that has been terminated attempts to sign up for service from Consumer Cellular again, the information gathered by Consumer Cellular will allow it to identify that customer as having been previously terminated and Consumer Cellular will not initiate service for that customer.

Finally, Consumer Cellular commits 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.