

Robocall Mitigation Plan

Prepared by

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Introduction

Robocalls are automated phone calls that deliver a recorded message, often with the intent to scam or defraud the recipients. Robocalls are a major source of annoyance and frustration for consumers, as well as a threat to their privacy and security. According to the Federal Communications Commission (FCC), Americans received nearly 46 billion robocalls in 2020, and the problem is only getting worse.

The FCC has adopted new rules and regulations to combat the robocall problem and has mandated that all voice service providers implement a technology called STIR/SHAKEN by June 30, 2021. STIR/SHAKEN is a framework that allows voice service providers to authenticate and verify the caller ID information of the calls they originate and terminate, and to flag or block calls that are spoofed or fraudulent.

This document outlines the robocall mitigation plan of Continuant, Inc., a voice service provider that offers landline, wireless, and VoIP services to customers in the United States. The document describes the current status of its STIR/SHAKEN implementation, the measures Continuant, Inc. has taken to prevent illegal robocalls from originating or terminating on its network, and the steps we will take to monitor and report on its robocall mitigation efforts.

Legal and Regulatory Compliance

Continuant, Inc. is registered with the FCC under FCC Registration Number (FRN) 0035490721.

STIR/SHAKEN Implementation Status

Continuant, Inc. has been delivering voice services to customers since 2018. Continuant, Inc. works to only deliver services through providers that support the STIR/SHAKEN protocol, and it has established interoperability with other voice service providers that have also implemented STIR/SHAKEN.

Continuant, Inc. works with international customers and at times will have to work with non-STIR/SHAKEN providers to deliver services to its customers. In these scenarios, Continuant, Inc. will make recommendations for telecommunications carriers based on their support of STIR/SHAKEN. However, in all cases, these providers are a direct provider to the customer unbound by Continuant, Inc.'s solution requirements and policies.

Robocall Prevention Measures

In addition to implementing STIR/SHAKEN, Continuant, Inc. has taken several other measures to prevent illegal robocalls from originating or terminating on its network. These measures include:

- Working with providers that maintain a robust robocall detection and blocking system that uses advanced algorithms and machine learning to analyze call patterns and behaviors, and to block or divert suspicious calls to a voicemail or a challenge-response system.
- Offering its customers free and optional tools and features to protect themselves from unwanted robocalls, such as call blocking, call filtering, call labeling, do not disturb, and call trace.
- Educating its customers about the robocall problem and how to avoid falling victim to scams or frauds, through its website, social media, newsletters, and customer service channels.
- Participating in industry-led initiatives and coalitions to share best practices and information on robocall trends and threats, such as the Industry Traceback Group (ITG), the USTelecom Robocall Mitigation Database (RMD), and the Communications Fraud Control Association (CFCA).
- Cooperating with law enforcement and regulatory agencies to investigate and prosecute robocallers and spoofers, and to comply with the relevant laws and rules, such as the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, and the Pallone-Thune TRACED Act.

Robocall Monitoring and Reporting

Continuant, Inc. is committed to monitoring and reporting on its robocall mitigation efforts, and to continuously improving its performance and effectiveness in combating the robocall problem. Continuant, Inc. has established the following mechanisms and metrics to track and measure its robocall mitigation activities:

- Continuant, Inc. has designated a robocall mitigation officer (RMO) who is responsible for overseeing and coordinating its robocall mitigation plan, and for reporting to the FCC and other stakeholders on its progress and achievements.
- Continuant, Inc. has implemented a robocall mitigation dashboard that provides real-time and historical data on the volume and nature of the calls that originate and terminate on its network, and the actions Continuant, Inc. has taken to block or label them.
- Continuant, Inc. has set up a robocall mitigation feedback system that allows its customers to report and rate the calls they receive, and to provide us with valuable insights and suggestions on how to improve its robocall mitigation services.
- Continuant, Inc. has adopted a robocall mitigation scorecard that evaluates its performance and effectiveness in reducing the number and impact of illegal robocalls on its network and customers, and that identifies the areas and opportunities for improvement.

Training and Awareness for Robocall Mitigation

Continuant, Inc. has also invested in training and awareness programs for its employees and customers on the best practices and tools for robocall mitigation.

- Continuant, Inc. has provided its staff with regular updates and guidance on the latest robocall trends, threats, and solutions, and has ensured that they have the necessary skills and knowledge to implement and operate its robocall mitigation systems effectively and efficiently.
- Continuant, Inc. has also created and disseminated educational materials and resources for its customers on how to identify, avoid, and report robocalls, and how to use the features and options that Continuant, Inc. offers to block or label unwanted calls.
- Continuant, Inc. has solicited and incorporated feedback from its customers on their satisfaction and preferences regarding its robocall mitigation services and has used this information to improve and tailor its offerings to meet their needs and expectations.

Conclusion

Continuant, Inc. provides its customers with a safe and secure voice service that strives to be free from illegal robocalls and spoofing. Continuant, Inc. has implemented STIR/SHAKEN and other robocall prevention measures through its provider partners, and Continuant, Inc. has established a robust robocall monitoring and reporting system to ensure its compliance and accountability. It will continue to work with its industry partners, regulators, and law enforcement to combat the robocall problem, and to protect its customers and the public from the harms and risks posed by robocalls.