

Central Illinois Communication Services, Inc Robocall Mitigation Plan

This document outlines Central Illinois Communication Services, Inc's Robocall Mitigation Plan to comply with the Federal Communications Commission's (FCC) requirements for voice service providers, as detailed in 47 CFR § 64.6305. This plan leverages the exemption provided under 47 CFR 64.6304.

I. STIR/SHAKEN Implementation Status

Central Illinois Communication Services, Inc is a downstream customer of Skyetel and as such, does not directly originate traffic on its network. Therefore, Central Illinois Communication Services, Inc claims exemption from the STIR/SHAKEN implementation requirements under 47 CFR 64.6304. This exemption applies to voice service provider networks that rely on technology incapable of initiating, maintaining, carrying, processing, and terminating Session Initiation Protocol (SIP) calls with the transmission of STIR/SHAKEN attestation data.

While exempt from direct STIR/SHAKEN implementation, Central Illinois Communication Services, Inc is committed to mitigating illegal robocalls on its network. Central Illinois Communication Services, Inc will fulfill the following obligations:

- Robocall Mitigation Database Filing: Central Illinois Communication Services, Inc will register on the FCC's Robocall Mitigation Database and maintain an updated certification stating its exemption status under 47 CFR § 64.6304. This filing will include a detailed Robocall Mitigation Plan.
- Downstream Provider Obligations: Central Illinois Communication Services, Inc will comply with the FCC's prohibition on accepting traffic from non-compliant providers by May 28, 2024. This includes refusing traffic from non-gateway intermediate providers not listed in the Robocall Mitigation Database.

II. Traceback Requests

Central Illinois Communication Services, Inc will respond to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) within 24 hours of receipt. Central Illinois Communication Services, Inc will cooperate fully with these entities in investigating and mitigating illegal robocalls. III. Ongoing Robocall Mitigation Practices While Central Illinois Communication Services, Inc is exempt from direct STIR/SHAKEN implementation due to its downstream customer status, the organization remains committed to mitigating robocalls. Central Illinois Communication Services, Inc will implement the following measures:

- Network Monitoring and Call Detail Record (CDR) Analysis: Central Illinois Communication Services, Inc will actively monitor its network for suspicious activity and analyze CDRs to identify unusual traffic patterns indicative of illegal robocalls.
- Cooperation with Upstream Providers: Central Illinois Communication Services, Inc will work closely with Skyetel, its upstream provider, to ensure they are actively mitigating illegal robocalls and comply with all applicable FCC regulations. This includes incorporating robocall prevention measures into contractual agreements with Skyetel.

III. Third-Party Analytics

Central Illinois Communication Services, Inc will leverage third-party call analytics solutions to enhance its robocall mitigation efforts. Central Illinois Communication Services, Inc will partner with a reputable vendor and implement a call analytics system to:

- Identify and block calls originating from known fraudulent sources and invalid numbers.
- Analyze call patterns and traffic volumes to detect anomalies that may indicate illegal robocalling

Central Illinois Communication Services, Inc recognizes the importance of combating illegal robocalls and is committed to remaining compliant with evolving FCC regulations and industry best practices.

This Robocall Mitigation Plan outlines Central Illinois Communication Services, Inc's proactive approach to minimizing the impact of illegal robocalls on its network and customers.