

# **Robocall Mitigation Program**

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**Submitted By:** ONDRIVECLOUD, LLC

**FCC Registration Number (FRN):** 0036083061

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## **1. Company Overview**

ONDRIVECLOUD is a small service provider (“VSP”) with less than 100,000 voice service subscribers lines, offering VoIP services across United States. Our mission is to provide high-quality, reliable, and secure communication services to our customers while maintaining full compliance with FCC regulations.

## **2. Commitment to Robocall Mitigation**

ONDRIVECLOUD is fully committed to combating unlawful robocalls and ensuring the integrity of our voice network. To this end, we have implemented a Robocall Mitigation Program (“RMP”) to include the obligations outlined in the Commission’s recent release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97 (rel. March 17, 2023). In compliance with the Report & Order, ONDRIVECLOUD submits this RMP and certification into the Robocall Mitigation Database.

## **3. Implementation of STIR/SHAKEN**

ONDRIVECLOUD has implemented the following measures:

- **STIR/SHAKEN Framework:**
  - We have fully enabled the STIR/SHAKEN authentication and verification protocols for all customers locations via our Gateway provider which is Bandwidth Inc.
  - Calls originating from our network are authenticated with appropriate attestation levels.
  - Calls received from external networks are verified using STIR/SHAKEN tokens.

## **4. Robocall Mitigation Practices**

We have established the following robocall mitigation practices to identify and prevent the origination of unlawful robocalls:

- **Traffic Monitoring:**
  - The Company analyzes and monitors all call traffic that originates on its network to identify behaviors that are consistent with illegal robocalling. If the Company identifies such calling patterns, it will take appropriate action to address these situations, including blocking such calls. As part of its analysis and monitoring procedures, we work closely with our Gateway provider. We are able to collect call data from the provider as well as our own CDRs from the PBX system so that we can immediately block any calls originating within our network that are identified as robocalls.

- **Caller ID Validation:**
  - Verification of Caller ID information to ensure accuracy and compliance with FCC rules.
- **Customer Vetting:**
  - Strict onboarding processes for new customers, including validation of customer identities and intended use cases for voice services.
- **Customer Limitation:**
  - Automated outbound calls is not a feature available in the system.
- **Call Analytics:**
  - Deployment of advanced analytics tools to identify and block suspicious or high-volume robocall traffic in real time.
  - High volume of short-term calls is instantly identified.
- **Collaboration with Industry and Law Enforcement:**
  - ONDRIVECLOUD commits to responding fully and within twenty-four (24) hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

## 5. Compliance and Reporting

- **Compliance Monitoring:**
  - Regular audits of our voice network and customer traffic to ensure compliance with the FCC's robocall mitigation requirements.
- **Reporting to the FCC:**
  - Submission of required certifications and reports to the FCC, including updates to the Robocall Mitigation Database.

## 6. Customer Education

ONDRIVECLOUD recognizes the importance of customer awareness in combating robocalls. To this end, we:

- Have specific Terms and Conditions within the customer contract to aid its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our calling plans and features. These terms include a section on "unauthorized use of services" that allows the Company to take the appropriate action it deems appropriate (to include blocking calls) to prevent any fraud or misuse of the network, which includes the detection of illegal robocalls.
- Provide educational materials to customers on identifying and avoiding scam calls.
- Offer resources to report suspected robocalls.

## 7. Continuous Improvement

We are committed to continuously enhancing our Robocall Mitigation Program by:

- Staying informed on new technologies and industry standards for combating robocalls.
  - Regularly reviewing and updating our mitigation practices to address emerging threats.
  - Participating in industry forums and initiatives aimed at eradicating unlawful robocalls.
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By submitting this document, ONDRIVECLOUD certifies compliance with the FCC's Robocall Mitigation Program requirements and affirms our commitment to preventing unlawful robocalls.