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# Robocall Mitigation Plan



This document outlines the Robocall Mitigation Plan of the South Georgia Governmental Services Authority ("SGGSA") d/b/a CNSNext. The plan specifies actions to attempt to prevent the origination, carrying, or processing of illegal robocalls based on SGGSA's role in the call chain. SGGSA will regularly assess risks, evaluate the effectiveness of its policies, and make changes to its practices as needed, including modifications to policies and procedures to ensure changes in its business, capabilities, and needs.

SGGSA is a Georgia Authority and body politic created by an Act of the Georgia General Assembly in 2001 (Ga. L. 2001, p. 3560) as an instrumentality of the State of Georgia. SGGSA provides voice and broadband services to customers within the service area for CNSNext. SGGSA offers interconnected VoIP services to its subscribers by reselling the wholesale services it obtains from Alianza, Inc. ("Alianza"). While SGGSA necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Alianza, SGGSA has also adopted this robocall mitigation plan to take its own measures to attempt limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Alianza and other downstream providers.

## **Know-Your-Customer Procedures**

*Subscriber Vetting:* The vast majority of SGGSA's end-user customers are either residential or single-party business lines. As part of its standard operating procedures, SGGSA performs due diligence with new and renewed customers, verifying the customer's identity and determining whether they are a business or residential customer. A valid address must be associated with a number during activation. To ensure accuracy, we verify the address by cross-checking it with the MSAG and the United States Postal Service. Service will not be provided if a new customer's identification cannot be verified.

*Contractual Terms:* SGGSA's terms of service prohibit the use of its telephone service for fraudulent or unlawful acts or purposes and prohibit customers from falsifying calling party identification information. SGGSA may terminate a customer's service for violations of its terms.

### **Use of Call Analytics to Identify and Block Unlawful Traffic**

As a reseller, SGGSA necessarily relies on its wholesale provider Alianza to monitor and detect patterns indicative of potential unlawful robocalls and to block such calls. While Alianza has not reported the use of any third-party call analytics system in its robocall mitigation plan on file with the FCC, it has reported the implementation of a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices.

If SGGSA receives a notification from Alianza of suspected unlawful robocall traffic originated by a SGGSA end user customer, SGGSA will conduct an investigation. To the extent a customer is found to have violated SGGSA's contractual terms, SGGSA will take action commensurate with the severity of the customer's offense, including, but not limited to, terminating the customer's service.

### **Know-Your-Upstream Providers Procedures**

SGGSA's sole direct upstream provider, Alianza, is a well known provider that is registered in the Robocall Mitigation Database. SGGSA understands from Alianza's Robocall Mitigation Plan that Alianza's direct upstream connections are with Tier 1 service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic. Alianza reports that it has existing agreements with Tier-1 carrier service providers from which it facilitates the provision of the service to its service provider customers. Alianza also reports that it has confirmed that each of those carriers are listed in the Robocall Mitigation Database.

### **Cooperation with the Traceback Group, Law Enforcement and Government Agencies**

SGGSA commits to providing a complete response to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies within 24 hours and to investigate and address suspected unlawful robocalls originated by SGGSA customers. SGGSA is committed to cooperating with state and federal regulators in efforts to prevent illegal robocalls. Additionally, SGGSA agrees to provide relevant non-proprietary information in response to legitimate inquiries regarding illegal robocalls and suspicious activity.

SGGSA is also committed to cooperating with Alianza on traceback requests and to fully comply with the FCC's robocall blocking requirements. SGGSA understands that Alianza will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the FCC; or (3) include a caller ID number or name that is on DNO list issued by ITG.