

Robocall Mitigation Plan for COMMA DOT LLC

Company Information:

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Introduction: COMMA DOT LLC is committed to preventing illegal robocalls from originating on its network. This Robocall Mitigation Plan outlines the measures taken to ensure compliance with the Federal Communications Commission (FCC) regulations and industry best practices.

1. Partial Implementation of STIR/SHAKEN Protocols

- COMMA DOT LLC has implemented the STIR/SHAKEN authentication framework on a portion of its network to verify caller ID information and reduce the likelihood of spoofed calls.
- For non-IP-based traffic and the portions of the network that do not yet support STIR/SHAKEN, alternative robocall mitigation techniques are utilized, including traffic analysis and call pattern monitoring.

2. Monitoring and Traffic Analysis

- Continuous monitoring of call traffic patterns to detect anomalies or signs of illegal robocalls.
- Use of analytics tools to identify high-risk call patterns, such as short-duration calls or high call volumes to known scam targets.
- Immediate investigation of flagged traffic and corrective actions taken when necessary.

3. Customer and Network Vetting Procedures

- Thorough vetting of new customers before providing voice services to prevent bad actors from using the network for illegal robocalls.
- Ongoing assessments of existing customers to ensure compliance with lawful call practices.

4. Call Blocking and Consumer Protection Measures

- Deployment of network-level call-blocking mechanisms to prevent known illegal robocalls from reaching consumers.
- Utilization of real-time databases of known spam numbers to proactively block fraudulent calls.

5. Cooperation with Regulatory Authorities and Industry Stakeholders

- Regular coordination with the FCC, law enforcement, and industry groups to stay updated on emerging robocall threats.
- Prompt response to traceback requests from the Industry Traceback Group (ITG) to identify and mitigate unlawful call sources.
- Compliance with all FCC mandates regarding robocall mitigation and participation in ongoing regulatory discussions.

6. Consumer Education and Complaint Handling

- Providing educational resources to consumers on how to identify and avoid robocall scams.
- Maintaining a dedicated support channel for consumer complaints related to unwanted robocalls and taking swift action to resolve issues.

7. Internal Compliance and Employee Training

- Ensuring all employees handling voice traffic are trained on robocall mitigation policies and procedures.
- Regular internal audits to verify compliance with mitigation measures and to enhance detection and prevention techniques.

Certification and Compliance Filing COMMA DOT LLC certifies that it has fully implemented this Robocall Mitigation Plan and complies with the FCC's requirements. The company has implemented STIR/SHAKEN authentication on a portion of its network and has alternative robocall mitigation measures in place for non-STIR/SHAKEN traffic. This plan will be filed with the FCC's Robocall Mitigation Database and updated as necessary to reflect improvements in technology and regulatory requirements.

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