

## **Cleveland Utilities Authority Robocall Mitigation Plan**

**FRN 0035555366**

Cleveland Utilities Authority (“CUA or Company”) have chosen to employ a multi-layered approach to address and mitigate illegal robocalling, and to participate in industry call trace back efforts. CUA is a provider of broadband Internet access service serving its utility footprint in Tennessee. CUA also offers interconnected VoIP services to its subscribers on a resold basis. Company’s wholesale VoIP provider is JSI LogicomUSA, LLC (“LogicomUSA”), a provider of wholesale and retail VoIP and other communications services. While the Company necessarily relies on the robocall mitigation policies, procedures, and safeguards provided by LogicomUSA Company has also adopted this robocall mitigation plan to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by LogicomUSA and other downstream providers. Company efforts include:

- Incorporation of robocall mitigation language into our contracts, terms of service, acceptable use policy, and/or other documents as appropriate prohibiting use of our platforms/services to make or receive illegal or fraudulent calls.
- Specifically, with respect to caller-ID, to require that the caller-ID value be either a number assigned to the calling party, or one which the caller has the explicit permission of the assignee to use.
- When non-compliant calls come to our attention, through our own analysis or via LogicomUSA (hereafter referred to as "3rd Party voice services provider"), we shall promptly investigate and take necessary action with the offending customer to mitigate ongoing illegal activity.
- Company shall provide a point-of-contact for traceback and takedown requests from bona fide sources and respond within twenty-four (24) hours. For credible requests that include sufficient supporting detail, we will not require a subpoena or similar documentation.
- Company shall share as much information with industry forensics efforts and enforcement officials as is practical and legal, recognizing that users of our platform that are breaking the law need not be afforded the same privacy protections as those complying with the rules.
- Company shall exercise its due diligence by requiring our service provider partners, including upstream provider partners, to implement these same practices and impose this same requirement on their partners, or face restrictions on their use of our platform/services, including, if necessary, complete termination of access.
- Company abuse mitigation practices shall be applied in a non-discriminatory manner.
- If we discover that traffic originally flagged as illegal is in fact legitimate, we will share that information with other parties in the call chain.

- Know You Customer Vetting: Company shall vet each customer thoroughly, with additional scrutiny of customers involved with auto-dialed traffic types. Anonymous test accounts will not be provided to auto-dialers.
- Company will employ real-time controls on traffic. All calls must have valid caller-ID values, and for auto-dialed calls, each value must be checked against the list of numbers that customer provided and that Company staff vetted before establishing service. Each customer must have a calls-per-second limit commensurate with the traffic description provided.
- Company shall monitor the traffic moving through its network. CDRs will be analyzed regularly by our 3rd Party voice service provider. Inspection of call durations to ensure that no auto-dialer traffic is being sent by customers that signed up for voice service. Company will track call volumes and caller-ID utilization to spot changes indicative of illegal robocalls. Verify most frequent Caller-IDs to identify any that are being misused.
- We shall require our 3rd Party voice services provider to check the Certificate Revocation List (CRL) as part of their routine compliance activities.
- Company has identified a single point of contact in charge of responding to traceback requests, and respond to traceback requests as soon as possible as well as work with, communicate and cooperate with state Attorneys General about recognized scams and trends in illegal robocalling. Update the state Attorneys General about potential additional solutions for combatting illegal robocalls.
- For VoIP residential customers Company makes available free, easy-to-use call blocking and labeling tools and regularly engage in easily understandable outreach efforts to notify customers about these tools. For all types of customers, Company implements network-level call blocking at no charge. We use best efforts to ensure that all tools offered safeguard customers' personal, proprietary, and location information.
- Company uses best efforts to confirm the identity of new commercial VoIP customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and understanding the nature of the customer's business including if/how they will employ auto-dialers or other robocall style tools in the conduct of their business.
- We monitor, through our 3rd party Regulatory Compliance Consultant, the efforts of the Federal Trade Commission and the Federal Communication Commission regarding their robocall mitigation efforts, identification of industry trends, provision of consumer education materials, and other related information and alerts.