



4125 North Bank Street  
Kingman, AZ 86409-3601

**Main number: (928) 263-6763**

Billing Department: (928) 681-3113

Fax number: (928) 753-2477

#### Robocall Mitigation Plan

Copper Canyon Communications LLC is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in

investigating and stopping any illegal robocallers that it learns are using our service to originate calls or

transit calls into the United States and territories.

We are a reseller of PayG LLC dba SkySwitch (RMD0002940) and CoreDial (RMD0002771), (referred

to below as: "The Company or Company"), and do not have the capability to implement STIR/SHAKEN. PayG LLC dba SkySwitch and CoreDial have implemented STIR/SHAKEN protocols

in their IP Voice networks.

We have not been prohibited from filing a certification in the Robocall Mitigation Database. Copper Canyon Communications LLC, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

Copper Canyon Communications LLC and the Company commit to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The

Company shall cooperate with these groups to investigate and stop any illegal robocallers from using

Company's service to carry or process illegal calls. When notified by the FCC's Enforcement Bureau,

Company shall block and report identified illegal traffic, and any substantially similar traffic, on an

ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company

receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that

the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation

as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took

to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not



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Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-

party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The

Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns,

originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling. In addition, we

follow the best practices for vetting caller identity described by the NANC Call Authentication Trust

Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). The process

includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.

All new customers are verified with a combination of electronic and manual verification systems, credit

reviews, references from trusted industry members, and previous experiences with customer executives

and employees. Copper Canyon Communications LLC severely limits the capabilities of new accounts until these appropriate processes are complete.

Copper Canyon Communications LLC utilizes 2 hosted VoIP platforms:

1. PayG LLC dba SkySwitch

Arborcrest 1,

751 Arbor Way

Suite 150

Blue Bell, PA 19422

Phone: 747.777.8100

Email: [support@skyswitch.com](mailto:support@skyswitch.com)

Copper Canyon Communications LLC and the Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or

they are not authorized to use has occurred or is suspected. The Company is able to block the

originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer



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relationship to prevent robocalling, invalid originating number or spoofed origination number transiting

the Company's networks.

In addition, we have implemented a Call Abuse Policy, as it pertains to the TRACED Act, and have

published the following policy to our web site, terms of use, and have notified our customers of the

policy as copied below:

"Any call originated on Copper Canyon Communications LLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls

meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the

subscriber may be disconnected from Copper Canyon Communications LLC network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the

subscriber may be subject to fines and penalties imposed by the FCC