



CONTRAST Communications

418 Chestnut Street

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CONTRAST COMMUNICATIONS LLC Robocall Mitigation Policy

This Robocall Mitigation Plan is submitted by CONTRAST Communications LLC pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC), which require all “voice service providers” to establish a “robocall mitigation plan.” This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network and services. As a provider utilizing an underlying interconnected VoIP platform, the Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls by its customers. In addition to following these steps, the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocalls that may use its service to originate calls.

1. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, the Provider’s status with respect to STIR-SHAKEN implementation is as follows:

- The Provider utilizes a third-party interconnected VoIP service provider, Skyswitch/CoreDial, to originate and terminate all voice calls.
- CONTRAST does not directly implement or attest to STIR/SHAKEN. All voice calls originate on the Skyswitch/CoreDial platform, and they are responsible for their own STIR/SHAKEN implementation and attestation policies.
- CONTRAST relies on the underlying mitigation and STIR/SHAKEN processes implemented by Skyswitch/CoreDial for calls traversing their platform. Calls originating through our service are subject to the policies and procedures set forth herein and the policies of our upstream provider, which are intended to prevent the origination of illegal robocalls.

2. TRACEBACK REQUESTS

As noted above, the Provider will cooperate with the FCC, law enforcement, and the ITG on all traceback requests and investigations. To allow for timely and comprehensive response

efforts, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received, and commits to fully responding to any traceback request received within 24 hours after receiving the same. As part of its efforts to assist in the successful traceback of illegal robocalls, the Provider will:

- Promptly identify the upstream provider (Skyswitch/CoreDial) used for the suspected illegal call.
- Promptly identify the CONTRAST customer of the service from which the call originated.

3. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

The Provider relies entirely on Skyswitch/CoreDial as its underlying Voice over Internet Protocol (VoIP) platform for all voice service origination and termination.

- CONTRAST maintains a direct business relationship with Skyswitch/CoreDial and monitors their ongoing compliance with FCC rules, including their Robocall Mitigation Plan.
- The Provider will cooperate fully with Skyswitch in identifying and shutting down illegal traffic, and relies on the robocall prevention language and policies mandated by Skyswitch within their service agreements for the mutual benefit of protecting both networks.
- The Provider relies on the mitigation capabilities that are native to or integrated with the Skyswitch platform.

4. ONGOING ROBOCALL MITIGATION PRACTICES

The Provider relies heavily on the real-time monitoring and mitigation capabilities of the Skyswitch platform.