



Robocall Mitigation Plan

Know Your Customer

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>)

Extension

Pursuant to 47 CFR 64.6304(d), because CL Tel initiates, maintains, carries, processes, and/or terminates SIP calls in non-IP format, the FCC's continuing extension applies to its TDM traffic until such time that the FCC notifies providers of industry standards for this traffic.

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within 24 hours and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Some of the voice traffic we originate on our voice network is authenticated with STIR/SHAKEN. The remainder of the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

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