

# 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>). Our customers are fully vetted on these best practices.

## 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.

## STIR/SHAKEN Extensions

We have not implemented STIR/SHAKEN in our network but have begun the application processes. DIDs provided to our clients are currently exclusively obtained from Sinch/Inteliquent/Onvoy (RMD0003833) with which we have dedicated SIP Trunks. As our exclusive provider, we have a contractual agreement with Sinch/Inteliquent/Onvoy for them to perform Robocall Mitigation and STIR/SHAKEN caller attestation on all calls presented to them on the SIP Trunks.

## Robocall Mitigation Program

We rely on software provided by Sinch/Inteliquent/Onvoy to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Their complete RMP.pdf is provided on the FCC's Robocall Mitigation Database (reference RMD0003833)

Combining behavioral analytics, caller authentication and verification features:

- **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- **Do Not Call Registry:** We comply with the FTC's rules for the Do Not Call Registry.

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 the **Communication Service Solutions** 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 **Communication Service Solutions** 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 or the jurisdictional court."*