



Cloud Park UC Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by **Cloud Park UC** pursuant to **47 C.F.R. § 64.6305**. This document outlines the policies and procedures Cloud Park UC will employ to prevent illegal robocalls from originating on its network once operations commence.

I. STIR/SHAKEN Implementation Status

Cloud Park UC is committed to full compliance with FCC caller ID authentication mandates.

- **Implementation Plan:** Cloud Park UC intends to implement the STIR/SHAKEN framework on all SIP-capable portions of its network prior to the initiation of voice service.
- **Certification:** Cloud Park UC will certify its implementation status in the FCC Robocall Mitigation Database (RMD) as required by federal law.

II. Traceback Requests

Cloud Park UC views rapid cooperation as a critical responsibility.

- **24-Hour Commitment:** We will dedicate sufficient resources to provide a full response to all traceback requests from the FCC, law enforcement, or the Industry Traceback Group (ITG) within **24 hours** of receipt.
- **Traceback Point of Contact:** Cloud Park UC has designated a primary point of contact (see Appendix A) to manage these requests 24/7.

III. Customer Vetting (Know Your Customer)

To ensure the legitimacy of our future users, Cloud Park UC will employ the following "Know Your Customer" (KYC) protocols:

- **Identity Verification:** We will collect and verify physical addresses, federal tax IDs (EIN), and business registration for all subscribers.
- **Usage Review:** High-volume commercial entities will undergo a more stringent background check and a "use-case" review to ensure their traffic patterns are legitimate.
- **Contractual Prohibitions:** All service agreements will include an Acceptable Use Policy (AUP) that strictly prohibits illegal robocalling and provides for immediate service termination upon violation.

IV. Telephone Number Validation

Cloud Park UC will prevent "spoofing" by ensuring users have the legal right to the Caller ID they display:

- **Switch Configuration:** Our switching equipment will be configured to only allow calls where the originating number matches the resources assigned to that specific subscriber.
- **Manual Verification:** Customers requesting to use numbers not directly assigned by Cloud Park UC (e.g., for out-pulsing a main office number) must provide proof of authorization.

V. Ongoing Mitigation & Analytics

Cloud Park UC will use a proactive approach to monitor traffic patterns once live:

- **Traffic Analysis:** We will monitor for spikes in usage, high volumes of short-duration calls, and low call-completion rates.
- **Mitigation Actions:** If patterns consistent with illegal robocalls are detected, Cloud Park UC will initiate internal tracebacks and, if necessary, suspend the originating account.

Appendix A: Contact & Provider Information

Role	Details
Traceback Point of Contact	Raym Long
Title	CEO
Phone Number	609-362-5970
Email Address	rlong@rjldg.com
Upstream Provider(s)	Pending Selection (Will be vetted for RMD compliance)
Analytics Vendor	Pending Selection (To be implemented prior to launch)

