

Creative Consultants Group, Inc. Robocall Mitigation Program Description

Creative Consultants Group, Inc. (CCG) is committed to full compliance with all applicable regulations established by the Federal Communications Commission (FCC) regarding robocall mitigation, caller ID authentication, and prevention of illegal robocalling and spoofing activities.

1. Service Model and Network Overview

CCG provides hosted voice and unified communications services exclusively through its upstream provider, CoreDial, LLC. CCG does not operate its own switching infrastructure or numbering resources. All telephone numbers, signaling, and call routing are provisioned, managed, and controlled by CoreDial.

CoreDial is responsible for:

- Management of numbering resources
- Implementation of STIR/SHAKEN caller ID authentication frameworks
- Certificate management and attestation
- Network-level robocall mitigation controls

2. STIR/SHAKEN Implementation

CCG relies on CoreDial's fully implemented STIR/SHAKEN framework to authenticate caller ID information for all outbound calls originating from its customers.

CoreDial:

- Signs outbound calls using valid STIR/SHAKEN certificates
- Ensures compliance with FCC mandates for caller ID authentication
- Maintains all private keys and certificates required for attestation

As a downstream reseller, CCG does not directly manage STIR/SHAKEN certificates but ensures all traffic is routed through compliant infrastructure.

3. Customer Vetting and Acceptable Use Policy

CCG enforces strict onboarding and usage policies to prevent abuse of its services for illegal robocalling or spoofing.

All customers are subject to:

- Business identity verification during onboarding
- Validation of intended use of voice services
- Agreement to CCG's Acceptable Use Policy prohibiting:
 - Unlawful robocalling

- Caller ID spoofing
- Transmission of fraudulent or misleading calls

4. Traffic Monitoring and Enforcement

CCG actively monitors customer usage patterns and relies on both internal review and upstream provider analytics to identify suspicious or non-compliant activity.

Mitigation actions include:

- Immediate suspension of any customer suspected of robodialing, spoofing, or violating FCC regulations
- Investigation of flagged traffic in coordination with CoreDial
- Termination of services for confirmed violations

CCG maintains a zero-tolerance policy for illegal robocalling.

5. Traceback Cooperation

CCG fully cooperates with industry traceback efforts led by organizations such as the USTelecom Industry Traceback Group.

Upon receipt of a traceback request, CCG will:

- Respond promptly and in good faith
- Work with CoreDial to identify call origination details
- Take immediate corrective action if a customer is found responsible

6. Reliance on Upstream Provider Mitigation

As a reseller, CCG's robocall mitigation strategy is built on:

- CoreDial's network-level protections
- STIR/SHAKEN authentication enforcement
- Carrier-grade analytics and fraud detection systems

CCG ensures that all traffic is transmitted through CoreDial's compliant infrastructure and does not permit direct customer interconnection that bypasses these controls.

7. Recordkeeping and Compliance

CCG maintains appropriate records of:

- Customer onboarding documentation
- Service agreements and acceptable use acknowledgments
- Enforcement actions taken against violators

These records are retained in accordance with FCC requirements and are available upon request.

Summary

Creative Consultants Group enforces a strict, compliance-driven robocall mitigation program built on:

- Exclusive use of CoreDial's FCC-compliant infrastructure
- Full participation in STIR/SHAKEN authentication
- Aggressive enforcement, including immediate suspension of suspected violators
- Cooperation with traceback and regulatory authorities

CCG is committed to protecting the integrity of the public telephone network and preventing misuse of its services.