

Robocall Mitigation Plan: Connect Call Global, LLC d/b/a CCG Connect

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Filer: Connect Call Global, LLC d/b/a CCG Connect

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I. Introduction

Connect Call Global is a Voice Service Provider and reseller of voice services. We utilize the NuSO platform for service delivery and Bandwidth.com as our underlying carrier for PSTN termination. Our network edge is managed via a Sansay Session Border Controller (SBC). This plan outlines our commitment to preventing, detecting, and mitigating illegal robocall traffic originating on our network.

II. Implementation of STIR/SHAKEN

Pursuant to 47 CFR § 64.6304(b), [Your Business Name] is currently exempt from implementing STIR/SHAKEN directly because we are a reseller without the network infrastructure necessary to obtain an SPC token.

- **Upstream Signing:** All calls originated by our customers are handed off to our upstream providers (**NuSO** and **Bandwidth.com**), who provide authentication and signing (Attestation) on our behalf.
- **Transit:** We ensure that SIP headers required for STIR/SHAKEN (Identity headers) are preserved as they traverse our NuSO/Sansay environment.

III. Robocall Mitigation Practices

We employ a multi-layered approach to robocall mitigation:

1. **Know Your Customer (KYC):**
 - We vet all new customers before granting access to our network. This includes verifying business identities (EIN/Tax ID), physical addresses, and intended use cases.
 - We strictly prohibit customers from using our service for high-volume, short-duration traffic typical of illegal robocalling without prior authorization and legitimate business justification.
2. **Technical Mitigation (Sansay SBC):**
 - **Do-Not-Originate (DNO) Filtering:** We utilize our **Sansay SBC** to enforce "Do-Not-Originate" lists. We block calls that attempt to spoof invalid, unallocated, or unused numbers (e.g., 000-000-0000 or numbers on the FCC/Industry DNO lists).

- **Rate Limiting:** We configure our SBC to detect and throttle unusual spikes in call volume or high-velocity dialing patterns that deviate from a customer's established baseline.
- 3. **Upstream Carrier Integration:**
 - We rely on **NuSO's** built-in fraud detection and **Bandwidth's** [fraud mitigation best practices](#) to identify and block suspicious traffic patterns before they reach the PSTN.

IV. Traceback Commitment

Connect Call Global, LLC commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) **within 24 hours**.

- Our dedicated point of contact for traceback is **Chris Lutts** (clutts@ccgconnect.com).
- Our internal systems allow us to rapidly identify the source of any call by cross-referencing call detail records (CDRs) from our Sansay and NuSO logs.

V. Conclusion

Connect Call Global, LLC is dedicated to being a "clean" provider. We will continue to update our practices and tools, including our Sansay SBC configurations, to ensure we remain in full compliance with FCC robocall mitigation mandates.