

Robocall Mitigation Plan (RMP)

1. Purpose

The purpose of this **Robocall Mitigation Plan (RMP)** is to outline Cloudyline strategies for mitigating and preventing robocalls and illegal call practices on its network. The plan adheres to the **Federal Communications Commission (FCC)** regulations, specifically under the **TRACED Act** and the **STIR/SHAKEN framework**, which are designed to reduce robocalls and caller ID spoofing.

2. Scope

This plan applies to all voice services provided by Cloudyline, including both **VoIP** and traditional telephone services, that are subject to FCC regulations. The RMP encompasses all activities related to robocall prevention, including the use of call authentication systems, call blocking, and consumer notification systems.

3. Key Definitions

- **Robocall:** A call made using automated technology to deliver prerecorded messages, often for unsolicited or illegal purposes.
- **STIR/SHAKEN:** A framework for authenticating caller ID information, ensuring that calls are legitimate and not spoofed.
- **Caller ID Spoofing:** The practice of falsifying the caller ID information to mislead recipients into answering a call.
- **TRACED Act:** The **Telephone Robocall Abuse Criminal Enforcement and Deterrence Act** (TRACED Act), which requires phone service providers to implement measures to mitigate robocalls.

4. Robocall Mitigation Measures

4.1 STIR/SHAKEN Implementation

- **STIR/SHAKEN Protocol:** Cloudyline will implement the **STIR/SHAKEN** caller authentication framework for all calls originating from or terminating to its network. The system will authenticate the legitimacy of a call's caller ID by verifying its origin and ensuring it is not spoofed.

4.2 Call Blocking and Filtering

- **Robocall Blocking:** Cloudyline will leverage advanced robocall blocking technology to prevent illegal and fraudulent robocalls from entering or exiting its network. This

includes using AI-powered solutions that automatically detect suspicious call patterns and block potentially harmful calls in real time.

- **Call Labeling:** For calls that are not blocked but may still be suspicious, Cloudyline will employ caller ID labeling services to warn customers about potential spam or robocalls. This labeling will alert customers to be cautious when receiving such calls.

4.3 Call Originator Authentication

- **Call Authentication:** Cloudyline will verify all calls originating from its network using the **STIR/SHAKEN** framework. This includes validating that the caller ID information transmitted with each call is legitimate and not falsified.
- **Registration of Calling Party:** For businesses or customers using Cloudyline services to make calls, Cloudyline will ensure that all calling parties are properly registered and authenticated in accordance with the rules set by the FCC.

4.4 Consumer Protection and Reporting

- **Consumer Notification:** Cloudyline will inform customers of the robocall mitigation measures in place and provide them with tools to report suspected robocalls. Customers will have access to features that allow them to block unwanted calls and view caller ID labels.
- **Complaint System:** A dedicated hotline or online portal will be available for consumers to report robocall violations and other fraudulent activity. This information will be promptly investigated and handled by Cloudyline.

5. Compliance with FCC Rules

Cloudyline commits to full compliance with the FCC's **Robocall Mitigation and Call Authentication regulations**, including the following:

- **TRACED Act Compliance:** Cloudyline will comply with the **TRACED Act**, ensuring it properly authenticates calls, blocks fraudulent calls, and reports compliance as required by the FCC.
- **STIR/SHAKEN Framework:** Cloudyline will adhere to the **STIR/SHAKEN** regulations, which require all voice service providers to authenticate caller ID information for calls originating from or terminating to their networks.

6. Monitoring and Reporting

- **Continuous Monitoring:** Cloudyline will continuously monitor its network for suspicious call activity and evaluate the effectiveness of its robocall mitigation measures. Real-time analytics and reporting tools will be used to detect any abnormalities or increases in robocall volumes.
- **Quarterly Reporting:** Cloudyline will provide quarterly reports to the FCC detailing its efforts to mitigate robocalls, including the number of blocked calls, labeled calls, and the effectiveness of its STIR/SHAKEN implementation.

7. Enforcement

- **Action Against Violators:** If a customer or third-party caller is found to be responsible for originating robocalls or engaging in illegal call practices, Cloudyline will take immediate action. This may include suspending or terminating their service, reporting them to the relevant authorities, and blocking their number from the network.
- **Penalties for Non-Compliance:** Cloudyline will enforce compliance with its robocall mitigation plan and take legal or regulatory action against any violations of the FCC's regulations. Failure to comply with the TRACED Act and STIR/SHAKEN requirements could result in penalties or sanctions from the FCC.

8. Risk Assessment

Cloudyline will periodically conduct risk assessments to evaluate the effectiveness of its robocall mitigation strategy. These assessments will identify new threats and allow the company to implement updated measures to further reduce robocall risks.

9. Plan Review and Updates

The Robocall Mitigation Plan will be reviewed annually or as necessary to reflect changes in FCC regulations, technological advancements, or internal processes. Any significant changes will be communicated to relevant stakeholders and customers.

- **Annual Review Date:** This plan will be reviewed.
- **Updates to the Plan:** Cloudyline will provide updates to the RMP as needed to ensure ongoing compliance with FCC regulations.

10. Contact Information

For questions regarding this Robocall Mitigation Plan, to report suspected robocalls, or for further assistance, please contact:

Conclusion

The **Robocall Mitigation Plan (RMP)** for Cloudyline is designed to comply with the **TRACED Act** and **STIR/SHAKEN** regulations, aiming to significantly reduce robocalls and caller ID spoofing on the company's network. By implementing these measures, Cloudyline is committed to providing a safer and more reliable communication experience for its customers.