

Implementation of a Robocall Mitigation Strategy - RMD

A comprehensive strategy for Robocall Mitigation is imperative for organizations to adhere to FCC regulations aimed at reducing unwanted and illegal robocalls. The following plan outlines essential steps and protocols to address robocalls in alignment with the latest FCC guidelines:

1. Understanding FCC Regulations:

Staying abreast of the latest FCC updates regarding robocalls is crucial for long-term compliance. Comby has been consistently monitoring the FCC's website for updates and compliance requirements.

2. Authenticating Caller ID:

Ensuring the accuracy and uniqueness of our organization's caller ID information. Exploring comprehensive caller ID authentication tools such as Mix/SHAKEN to verify the legitimacy of calls originating from our organization.

3. Training and Educating Employees:

Educating staff on FCC regulations concerning robocalls and emphasizing the importance of compliance. Training employees to only initiate calls to individuals who have provided explicit consent or have an existing business relationship.

4. Implementing Call Blocking and Filtering:

Deploying call-blocking and filtering mechanisms to prevent illegal robocalls from reaching our customers. Regularly updating and maintaining a list of known robocall numbers to block.

5. Monitoring and Analyzing Call Traffic:

Utilizing call analysis tools and algorithms to detect and isolate unusual call traffic patterns indicative of robocall activity. Issuing alerts and triggers for suspicious call patterns and promptly investigating them.

6. Obtaining Explicit Consent:

Ensuring that we have explicit consent from individuals before initiating any communications.
Maintaining records of consent, including the date, time, and method by which consent was obtained.

7. Providing Robocall Mitigation Services to Customers:

Offering our customers the option to opt-in to robocall mitigation services. Clearly communicating the benefits of such services in reducing nuisance calls.

8. Reporting Robocall Violations:

Encouraging employees and customers to report robocall violations to the FCC. Collaborating with law enforcement and regulatory agencies in investigations related to robocall fraud.

9. Maintaining Internal Compliance Records:

Maintaining organized records of all calls made by our organization, including call logs, timestamps, and call content (if applicable). Ensuring compliance with the Telephone Consumer Protection Act (TCPA) and other relevant regulations.

10. Regularly Reviewing and Updating Our Strategy:

Conducting periodic reviews of the robocall mitigation plan to assess its effectiveness. Making necessary updates and adjustments to remain in compliance with evolving FCC regulations.

11. Promoting Our Compliance Efforts:

Demonstrating our commitment to robocall mitigation and FCC compliance to build trust with customers and partners. Providing relevant information on our website or in customer communications.

12. Seeking Legal Guidance:

Consulting with legal experts specializing in telecommunications and regulatory compliance to ensure our organization remains compliant with all relevant laws and regulations.

13. Compliance with Regulatory Requirements:

It is imperative to ensure that our RMD plan incorporates timely response protocols in accordance with regulatory mandates, such as those outlined in 47 CFR 64.6305. By emphasizing the necessity for traceback responses within 24 hours, we demonstrate our commitment to adhering to legal standards and maintaining regulatory compliance, thereby mitigating potential risks associated with non-compliance.

14. Enhanced Operational Efficiency and Effectiveness:

Implementing a provision for traceback response within 24 hours not only aligns with regulatory expectations but also bolsters the efficiency and effectiveness of our RMD plan. Swift response times enable us to promptly address issues, mitigate the spread of harmful activities, and safeguard our network integrity. This proactive approach not only minimizes potential disruptions but also reinforces trust and reliability among stakeholders, fostering a positive reputation within the telecommunications industry.

By implementing this Robocall Mitigation Strategy, Comby aims to comply with FCC regulations, reduce the risk of Robocall violations, and contribute to a more trustworthy telecommunications environment for both our business and our customers. Recognizing that compliance with FCC regulations requires ongoing diligence and adaptability."