

YMax Communications Corp. Robocall Mitigation Plan

Document Control

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Document Revisions

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Summary

Public Notice DA 24-73, released January 25, 2024, announces effective dates and compliance deadlines for revised Robocall Mitigation Database filing requirements and related rules adopted in the Sixth Caller ID Authentication Report and Order, including the additions of and revisions to 47 CFR §§ 64.6303(c), 64.6305(d), 64.6305(e), 64.6305(f) and 64.6305(g).¹

Pursuant to these rules, all providers, regardless of whether they are required to implement STIR/SHAKEN—including all intermediate providers and providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN—are now required to file certifications and robocall mitigation plans to the Robocall Mitigation Database. They must also comply with expanded disclosure requirements for these submissions. Providers newly required to file in the Robocall Mitigation Database must submit their initial filings containing all required information and certifications by February 26, 2024.

Purpose

YMax Communications Corp. ("YMax") is a Voice Service Provider dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. YMax's infrastructure has a fully implemented STIR/SHAKEN program. YMax is not a foreign voice service provider.

This document delineates YMax's Robocall Mitigation Plan.

Know Your Customer

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that provider subscriber. A provider subscriber is an entity that has a business relationship with YMax in which we send calls on behalf of the subscriber to other voice service providers. YMax provides voice service only to its affiliates: magicJack VoIP Services, LLC, magicJack LP and magicJack SMB, Inc ("Affiliates").

Know Your Upstream Provider

In its capacity as a voice service provider, YMax has relationships with various upstream providers to facilitate all voice traffic originating on or terminating to the subscribers of YMax affiliates. The relationships with these upstream providers involve strong contractual terms.

¹ *In the Matter of Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (2023) (*Sixth Report and Order*).

Subscriber Agreement

YMax's Affiliates maintain a Subscriber Agreement/Terms of Service ("SAPS/TOS") that subscribers must agree to before being permitted to use Affiliates service over the YMax's network.² Among other things, the SAPS/TOS prohibits customers from:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- engaging in "autodialing" and/or "telemarketing";
- engaging in abusive or unsolicited communications, or any other mass, automated voice communications for commercial or marketing purposes
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using YMax's service to engage in or in connection with fraudulent activities.

All Affiliates SAPS/TOS specify that YMax or Affiliates may act immediately with or without notice, at its sole discretion, if believes the customer violated restrictions contained in the SAPS/TOS.

Mitigation During Service

YMax works to ensure that Affiliates can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers.

Analytics for Monitoring Traffic

YMax works to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- volume of outbound calls and average durations; and
- anomalies in call duration distribution

Investigate Suspicious Activity

YMax maintains a fraud team dedicated to monitoring and analyzing traffic patterns and information available to ensure suspicious activity reviewed and appropriate action taken. YMax is a Supporting Partner of the Industry Traceback Group.

When traffic analysis indicates suspicious activity, YMax has defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;

² magicJack, LP. & magicJack Voip Services Subscriber Agreement, https://help.magicjack.com/faq/saps/?_ga=2.268676088.862720195.1708829957-2022777834.1690204086 MAGICJACK SMB, INC. Terms of Service, <https://www.magicjackforbusiness.com/terms/>

- contacting the subscriber to understand their particular use case and validate that the activity belongs to that subscriber.

No third-party vendors are involved in YMax's analytics. YMax commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Suspicious Activity Resolution

If YMax identifies suspected robocalling patterns that are confirmed with further investigation, YMax will take appropriate action which may include suspending or terminating the subscriber's use of YMax's service.

The name, title, department, business address, telephone number, and email address of the person within YMax responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the traceback consortium, and law enforcement agencies, is as follows:

Contact Name: Stephan O'Rourke

Contact Title: Fraud Team

Contact Street: 931 Village Blvd., Suite 905, Box 386

Contact City: West Palm Beach

Contact State and Zip Code: FL 33409

Contact Telephone Number: 561-290-6001

Contact Email: reportabuse@magicJack.com

Plan Updates

YMax monitors industry best practices and its existing internal processes and may revise this plan where necessary. In the event of any material change to this plan, YMax will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Steven Sabados

I, Steven Sabados, Chief Information Security Officer of YMax Communications Corp., do hereby certify, under penalty of perjury, the following:

- (1) YMax Communications Corp. ("YMax"), a Voice Service Provider, and its infrastructure has a fully implemented STIR/SHAKEN program.
- (2) YMax's Business name and primary address are as follows:

YMax Communications Corp
931 Village Blvd. Suite 905, Box 386
West Palm Beach, FL 33409

- (3) YMax has no other business names in use.
 - (4) YMax's role in the call chain is a Voice Service Provider that is required to and has implemented STIR/SHAKEN.
 - (5) All calls YMax originate on its network in its capacity as a Voice Service Provider are subject to this Robocall Mitigation Plan.
 - (6) At no time in the prior two years, has YMax been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to YMax transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.
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