

HFA Services LLC – Robocall Mitigation Plan

Feb 20, 2024

Contents

Overview

- Related Entities Covered

- HFA Roles in the Call Chain

- HFA Commitments and Certifications

Know Your Customer/Know your Upstream Provider Process

Response to Traceback Requests Commitment

- Post notification Process to mitigate illegal traffic

Robocall Mitigation Program Description

- Role: Non-Gateway Intermediate Provider

 - Wholesale Inbound Traffic

 - Wholesale Outbound Traffic

- Role: Service Provider

 - Enterprise Inbound Traffic

 - Enterprise Outbound Traffic

Attachment A: Enterprise KYC Form

Attachment B: Wholesale KYC Form

Overview

This submission is intended to outline and show the commitment of HFA Services, LLC (“HFA”), and its related entities, to taking reasonable steps to avoid carrying illegal robocall traffic. HFA is committed to adhering to the deadlines and requirements set forth by the Federal Communications Commission (FCC) in the TRACED Act, as well as subsequent Reports and Orders. HFA continues to work with industry leaders, other service providers, and third-party solution providers to be proactive in combating against illegal robocalls.

Related Entities Covered:

- HFA Services, LLC dba Call48
 - Located at 2901 Clint Moore Rd, Suite 2 Box 215, Boca Raton, FL 33496
- HFA Services, LLC dba Skyetel
 - Located at 2901 Clint Moore Rd, Suite 2 Box 215, Boca Raton, FL 33496
- Operating Company Numbers (OCN) - None

HFA Roles in the Call Chain:

HFA is a diverse service provider, and as such can serve different roles to different customers. HFA is classified as a Direct Service Provider for enterprise customers and resellers and is classified as a Non-Gateway Intermediate Provider to our wholesale customer base.

HFA Commitments and Certifications:

- HFA is committed to performing reasonable steps to mitigate illegal robocall traffic from processing through its network.
- HFA commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocalls.
- HFA certifies that all calls that originate on the network are subject to the robocall mitigation program.
- HFA Confirms that any prior certification has not been removed by Commission action and they have not been prohibited from filing in the Robocall Mitigation Database.
- HFA confirms that they have fully implemented STIR/SHAKEN on their IP network.
- HFA confirms that it has provisions in Terms and Conditions that allow termination of services if any fraudulent or illegal traffic is identified.
- HFA is committed to performing a KYC process for each customer that purchases services.
- HFA confirms that it is utilizing the SOMOS DNO list along with internal blacklists to block unauthorized traffic.

Know Your Customer/Know your Upstream Provider Process

HFA provides services to both end-user customers as well as wholesale services to other service providers. For each type of customer, we follow a tailored process. “Attachment A” is the KYC form that our enterprise customers will fill out. “Attachment B” is the form used for wholesale service providers that HFA does business with. KYC forms are updated annually and reviewed. Once we receive the form or the update, then our internal team reviews and validates the information provided. HFA will reject any customer that is not incorporated in the United States. Enterprise credit card processing is also locked down to US only, and will not accept payment from prepaid cards, nor cards outside of the US. HFA has provisions in Terms and Conditions that allow termination of services if any fraudulent or illegal traffic is identified.

Enterprise validation (Role – Service Provider):

- KYC form is built into the portal that the customers log into. So, all new customers must go through the process.
- Verify company info with the Secretary of State
- Validate address by performing a google search and a map search. If the address is a PO box, or a mail forwarding location, then a physical address is also required separate from the mailing address.
- Verify that the website for the company is valid.
- Perform a review of the company and principles for prior litigation with Nexis Diligence.
- Validate if the company shows on social media like LinkedIn or Facebook.
- Google search for any FCC/FTC/State AG Complaints.

Wholesale validation (Role – Non-Gateway Intermediate Provider):

- Wholesale validation includes all the same Enterprise Validation plus the following:
- Validate carrier is in the RMD and compare its info to the address and email info provided.
- Validate carrier has an active 499 registration, and that its info matches the info provided.
- Validate the carrier shows they are Stir/Shaken compliant in the RMD.
- Validate the FRN provided.

Response to Traceback Requests:

HFA actively works with the Industry Traceback Group (ITG) in the investigation of traceback requests.

Due to CPNI, HFA follows strict process of only sharing information through the official ITG portal. Upon notice via any method – phone, email, or direct engagement through the portal – an investigation is initiated promptly.

Post notification Process to mitigate illegal traffic:

- Once we receive a Traceback, the ANI(s) involved are immediately blocked from our termination network.
- The result of the investigation and identification of the source is communicated to ITG via their Portal.
- We then report the issue to the client and ask them to take corrective action and share the steps taken.
- Clients not responding within 24 hours are given additional notice that their termination account will be suspended in the absence of a timely resolution.
- Weekly and Monthly reviews of Tracebacks is performed looking for any identifiable pattern.
- Clients triggering three or more Tracebacks in a thirty-day period and flagged for executive review. At a minimum, this leads to a discussion with the client regarding their traffic, and further review of their KYC process. Depending on the results of this discussion HFA may choose to close the account.

Robocall Mitigation Program Description

Role: Non-Gateway Intermediate Provider

Wholesale Inbound Traffic:

Customers that are service providers that HFA is selling telephone numbers to and providing Inbound services for those numbers. Due to the nature of this service, it is expected that our customers are following FCC regulations and have their own mitigation plan. We do the following in our effort to help clean up before or better inform our service provider customers.

- Check if Identity Header is present, and if not add a header with our own signature and a “C” level attestation.
- Block any traffic that is on the SOMOS DNO list.
- Block any traffic from unallocated or invalid US numbers.
- System wide manual blocking based on an ANI
- Utilize YouMail to monitor for suspicious use of DID numbers that we have assigned to customers.

Wholesale Outbound Traffic:

Customers that are service providers that HFA is selling termination services to. In this service we are not the service provider originating the traffic and are performing terminating services as an intermediate provider. We do the following in our effort to help mitigate potential illegal robocall traffic.

- Customers are set at a predefined CPS and Channel limit so they cannot freely process unlimited simultaneous calls.
- Customer must pass traffic pass authorization between the end point and the HFA network. This authorization could be via SIP Registration, or via authorized IP addresses.
- Block any traffic that is on the SOMOS DNO list.
- Block any traffic from unallocated or invalid US numbers.
- System wide manual blocking based on an ANI
- Framework that allows programmatic proactive blocking or reporting based on ANI or Source Media IP or Stir/Shaken Certificate. Framework allows the system to look at statistics such as Call Completion Ratio (CCR), Answer to Seizure Ratio (ASR), Average Call Duration (ACD), Attempt Counts, Short Duration Percentage (SDP), Percentage of specific downstream release codes (404, 408, 407, 603, 487)
- Calls that cross our network without a proper SS Identity header will have one place on the call with a proper attestation. C is the default unless the customer has purchased the numbers through HFA and signed additional contract amendments.

Role: Service Provider

Enterprise Inbound Traffic:

Direct Enterprise Customers along with Non-Facility Based Resellers who purchase DID numbers with inbound services. These customers are direct connected to our network, so we send all traffic to the end users of the numbers. We perform the following in our effort to mitigate illegal robocall traffic:

- Routing decisions based upon TrueCNAM's spam score.
 - Link to TrueCNAM: <https://www.truecnam.com>
 - Explanation of our reputation routing: <https://support.skytel.com/hc/en-us/articles/360041179513-Spam-Filter>

- Global blocks for an ANI input manually.
- Block any traffic that is on the SOMOS DNO list.
- Block any traffic from unallocated or invalid US numbers.

Enterprise Outbound Traffic:

Direct Enterprise Customers along with Non-Facility Based Resellers who purchase outbound termination services. These customers are directly connected to our network, so HFA receives all traffic direct from the end users' systems that is making the calls. We perform the following in our effort to mitigate illegal robocall traffic:

- Customers are set at a predefined CPS and Channel limit so they cannot freely process unlimited simultaneous calls.
- Customer must pass traffic pass authorization between the end point and the HFA network. This authorization could be via SIP Registration, or via authorized IP addresses.
- Block any traffic that is on the SOMOS DNO list.
- Block any traffic from unallocated or invalid US numbers.
- System wide manual blocking based on an ANI
- Framework that allows programmatic proactive blocking or reporting based on ANI or Source Media IP or Stir/Shaken Certificate. Framework allows the system to look at statistics such as Call Completion Ratio (CCR), Answer to Seizure Ratio (ASR), Average Call Duration (ACD), Attempt Counts, Short Duration Percentage (SDP), Percentage of specific downstream release codes (404, 408, 407, 603, 487)
- Traffic Originating from our network and being terminated outbound is processed and an Identity header added per Stir/Shaken standards.

[REDACTED]
[REDACTED]
HFA Services, LLC

2901 Clint Moore Rd, Suite 2 Box 215

Boca Raton, FL 33496

[REDACTED]

KNOW YOUR CUSTOMER QUESTIONNAIRE

CORPORATE INFORMATION

- 1. Customer Legal Name: _____
- 2. List of all business and trade names, fictitious names, and DBAs for the previous three (3) years: _____

- 3. State/Country and Year of Incorporation: _____
- 4. Federal Tax ID No. (FEIN) or foreign business license number: _____

CONTACT INFORMATION

- 1. Physical Address: _____
- 2. Billing Address (if different): _____
- 3. Website address: _____ *Social Media: _____
- 4. Contacts:

Billing Contact

- Name: _____
- Email: _____
- Phone Number: _____
- Physical Address: _____

Compliance Contact

- Name: _____
- Email: _____
- Phone Number: _____
- Physical Address: _____

Operation/Network Contact

- Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

Direct or Indirect Owner(s)

Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

BUSINESS PURPOSE & ACTIVITIES

1. Type of Business (e.g., telecom, VoIP (wholesale, retail, or both) non-communications provider (specify business))

2. Describe types of voice services utilized (e.g., local, long distance, VoIP, TDM, toll-free, inbound only, outbound only) _____

3. Do you or your customers originate conversational call traffic, or intend to do the same?

_____Yes _____No

4. Do you engage in telemarketing?

_____Yes _____No

a. If yes, please describe: _____

- b. If yes, do you use telephone calls that deliver prerecorded messages?

_____Yes _____No

c. If yes, are you registered and utilize the DNC list?

_____ Yes _____ No

5. Do you generate auto-dialed traffic?

_____ Yes _____ No

a. If yes, please describe: _____

REGULATORY COMPLIANCE

1. Have you been blocked from another voice service provider's network after being determined to be a "bad-actor upstream voice service provider" pursuant to a notice to the FCC? _____ Yes _____ No

2. Have you or the controlling person(s) of the entity ever had an adverse judgment against it in a civil lawsuit alleging claims under the TSR, the TCPA, or any other lawsuit regarding Robocalls, automated dialing, calls to the DNC Registry or any state do not call registry, spoofed caller ID numbers, or otherwise unlawful telemarketing or solicitations?

_____ Yes _____ No

DOCUMENT REQUEST - Please attach the following documents:

1. Copies of the written policies, practices, and procedures documenting or describing its initiation of, and compliance with, Traceback Requests
2. Copies of the written policies, practices, and procedures monitoring, reviewing, and analyzing call traffic to identify and block unlawful Robocalls or investigate patterns consistent therewith.

CERTIFICATION

The undersigned certifies that s/he is an officer of the Customer and that the Customer has knowledge of the U.S. laws prohibiting the generation and transmission of illegal, harassing or otherwise unwanted voice calls, including but not limited to the Telephone Consumer Protection Act, Truth in Caller ID Act, Telemarketing Sales Rule and Wire Fraud Statute. The

undersigned also confirms that Customer complies with these laws and consents to disclose all details if questions arise regarding potential violations of these laws.

The undersigned further states that Customer is aware of the communications industry traceback groups, certifies that Customer will respond promptly to all traceback requests and take effective steps to address any illegal traffic transmitted on its network. Customer will further include contract terms with its customers to ensure its upstream sources are familiar and compliant with laws prohibiting the generation and transmission of illegal, harassing or otherwise unwanted voice calls.

I verify that I am authorized to legally bind the Customer by my signature.

Name _____

Title _____

Signature _____

Date _____

KNOW YOUR CUSTOMER QUESTIONNAIRE

CORPORATE INFORMATION

5. Customer Legal Name: _____
6. List of all business and trade names, fictitious names, and DBAs for the previous three (3) years: _____

7. State/Country and Year of Incorporation: _____
8. Federal Tax ID No. (FEIN) or foreign business license number: _____

CONTACT INFORMATION

5. Physical Address: _____
6. Billing Address (if different): _____
7. Website address: _____ *Social Media: _____
8. Contacts:

Billing Contact

Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

Compliance Contact

Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

Operation/Network Contact

Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

Direct or Indirect Owner(s)

Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

Name: _____

Email: _____

Phone Number: _____

Physical Address: _____

BUSINESS PURPOSE & ACTIVITIES

6. Type of Business (e.g., telecom, VoIP (wholesale, retail, or both) non-communications provider (specify business))

7. Describe types of voice services provided (e.g., local, long distance, VoIP, TDM, toll-free, inbound only, outbound only) _____

8. Describe types of businesses served (e.g., conference calling, call centers, international, enterprise, small and medium enterprises, wireless carriers, hosted PBX, other (please specify)) _____

9. Do you or your customers originate or carry conversational call traffic, or intend to do the same?

_____Yes _____No

10. Do you or your customers originate or carry auto-dialed call traffic, or intend to do the same?

_____Yes _____No

11. Do you or your customers act as an Originator or U.S. Point of entry? _____Yes _____No

12. Do you or your customers engage in telemarketing?

_____Yes _____No

a. If yes, please describe: _____

b. If yes, do you use telephone calls that deliver prerecorded messages?

_____Yes _____No

13. Do you or your customers generate auto-dialed traffic?

_____Yes _____No

a. If yes, please describe: _____

REGULATORY REGISTRATION & COMPLIANCE

3. FCC Registration Number (FRN): _____

4. FCC 499 Filer ID: _____

5. FCC 214 Filer ID: _____

6. Universal Service Fund registration number: _____

7. FCC Tax Exempt? _____Yes _____No

8. Are you a member of the US Telecom Industry Traceback Group (ITG)? _____Yes _____No

9. Do you actively participate in the ITG traceback process? _____Yes _____No

10. Have you been determined by the US Telecom Industry Traceback Group to be a "Non-Cooperative Voice Service Provider"? _____Yes _____No
11. Have you been blocked from another voice service provider's network after being determined to be a "bad-actor upstream voice service provider" pursuant to a notice to the FCC? _____Yes _____No
12. Have you or the controlling person(s) of the entity ever had an adverse judgment against it in a civil lawsuit alleging claims under the TSR, the TCPA, or any other lawsuit regarding Robocalls, automated dialing, calls to the DNC Registry or any state do not call registry, spoofed caller ID numbers, or otherwise unlawful telemarketing or solicitations?
13. Yes _____No
14. Are you registered in the FCC's Robocalling Mitigation database? _____Yes _____No
15. If not, when do you plan to register? _____
16. Have you implemented STIR/SHAKEN in your network? _____
17. Do you have a Robocalling mitigation plan in place to combat illegal Robocalling, including customer vetting and telephone number validation? _____Yes _____No
18. If not, when do you plan to put one in place?_____

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I verify that I am authorized to legally bind the Customer by my signature.

Name _____

Title _____

Signature _____

Date _____