

SIMPLY BITS LLC (OCN: 753K)
ROBOCALL MITIGATION PLAN

Pursuant to 47 C.F.R. § 64.6305, Simply Bits, LLC (Simply Bits) submits this updated report on its implementation of the STIR/SHAKEN call authentication framework and its robocall mitigation plan. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Simply Bits, LLC has in place to mitigate illegal robocalls. Simply Bits utilizes Alianza as its underlying voice services provider, which has fully implemented STIR/SHAKEN. Simply Bits also uses Inteliquent/Sinch as its call handling provider, which signs calls according to STIR/SHAKEN standards. Therefore Simply Bits relies on procedures, policies, and safeguards implemented by its partners to ensure Simply Bits' business customers are sufficiently protected against robocall and spoofing activities.

II. General Prohibition Against Illegal Robocalling

Simply Bits' end user services are subject to restrictions contained in its published Acceptable Use Policy (AUP) that prohibits activities associated with illegal robocalling. The use of autodialers, predictive calling/dialing services, automatic outbound dialing systems, and their functional equivalents are prohibited unless a customer received special approval by Simply Bits.

Simply Bits' end users are notified that Simply Bits may take action up to suspension or termination of service for violation of the AUP or their terms of service.

III. Know Your Customer

Simply Bits is a small local provider that has established business relationships with its customers. Simply Bits customers all have a local presence in the market, and Simply Bits performs the installation of service. Few customers are permitted to have VoIP service outside of Simply Bits' local service area in Tucson, Arizona, and those that do have main offices in the Simply Bits market.

IV. Traceback and Enforcement Cooperation

Simply Bits will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, Simply Bits will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same.

V. Upstream Providers

Simply Bits knows all the carriers from which it receives call traffic and has also confirmed that each of these carriers is listed in the Robocall Mitigation Database such that we are participating together for the goal of eliminating all Robocall traffic.

VI. Caller ID Configuration

Simply Bits configures its outgoing calls in order to verify the customer's identity and their right to use the telephone number presented on calls. Customers are not permitted to make calls using telephone numbers not assigned to their accounts.