

Merryville Investments, LTD, Inc.
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Lawrenceville, GA 30044

Contact Information

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Robocall Mitigation Plan Policy Overview

Subject to the Commission's recent release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking ("R&O") and specifically WC Docket No. 17-97 (rel. March 17, 2023) requiring all voice service providers ("VSP") to file robocall mitigation plans ("RMP") that:

1. outline the VSP's "reasonable steps" to avoid originating illegal robocalls;
2. "know your customer" procedures;
3. describe call analytics used to identify and block illegal traffic;
4. identify third-party vendors used in the process of telephone call delivery;

Merryville Investments, LTD, Inc. is compelled to comply.

Purpose:

Merryville Investments, LTD, Inc. is a Voice Service Provider.

Merryville Investments, LTD, Inc. does business as ("DBA") ClarityTel, VoiceConnect and LP Wireless.

Merryville Investments, LTD, Inc. is dedicated to stopping illegal calls from originating within it's network.

Merryville Investments, LTD, Inc. is certified in the FCC Robocall Mitigation Database as having fully implemented STIR/SHAKEN.

Merryville Investments, LTD, Inc. has previously submitted Robocall Mitigation Plan acceptable to the Commission.

In compliance with the R&O, Merryville Investments, LTD, Inc. submits this updated Robocall Mitigation Plan and certification.

Know Your Customer ("KYC")

The secure identification of a subscriber within the Merryville, Investments, LTD, Inc. network is explicitly tied to a User ID issued to the subscriber (a "subscriber" is an entity that has a business relationship with Merryville Investments, LTD, Inc.) Typically, this User ID is a valid US telephone number, a valid US IP address or unique 10 digit number. In the event a User ID is other than a valid US telephone number, User ID is specifically tied to a valid US number associated to the subscriber's account. Pursuant to the Commission's requirements of STIR/SHAKEN, all outbound calls placed on the network are signed by Merryville Investments, LTD, Inc. with and only with the valid US telephone number assigned to the subscriber and associated with the User ID assigned to the subscriber.

Additionally, Merryville Investments, LTD, Inc. takes an active role in identifying it's customers before the first telephone call is placed. This process includes collecting the following information:

- physical address of the business, person or entity placing calls
- physical address of each device on which telephone calls are initiated (911/711 purposes)
- contact persons, alternate phone numbers and email addresses
- nature of customer's business
- projected inbound and outbound call requirements

Know Your Upstream Provider

Pursuant to the Commission's directive in Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59 (Rel. May19, 2023) ¶¶ 49-51, Merryville Investments, LTD, inc. provides the following information concerning its upstream voice carriers.

Merryville Investments, LTD, Inc. receive voice traffic from the following upstream providers:

1. Bandwidth.com
900 Main Campus Drive
Suite 100
Raleigh, NC 27606
2. Commio (formerly thinQ)
5420 Wade Park Blvd
#100
Raleigh, NC 27606
3. Intelliquent (formerly Vitelity)
550 West Adams Street
Suite 900
Chicago, IL 60661

According to the FCC's Robocall Mitigation Database, each of Bandwidth.com, Commio and Intelliquent are fully STIR/SHAKEN compliant and, to the best information available to officers and directors of Merryville Investments, LTD, Inc., it is reasonable to believe that Bandwidth.com, Commio and Intelliquent will continue to comply with the Commission's directives relative to the delivery of voice traffic into Merryville Investments, LTD, Inc. networks.

Acceptable Use Policy ("AUP")

Merryville Investments, LTD, Inc. maintains AUP on each of it's DBA websites. AUP must be signed as part of the sign-up process. Among other things the AUP prohibits:

- Providing altered, deceptive, or false information about the identity of the caller or the origin of a message or phone call;
- Violating any applicable federal, state or local law;
- Violating applicable industry accepted guidelines; and

- Using any Merryville Investments, LTD, Inc. service to engage in or to participate in any fraudulent activity.

Contract terms of Merryville Investments, LTD, Inc. telephone services specify immediate suspension or termination of service for any violation of it's AUP.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify an outbound caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by and/or obtained by Merryville Investments, LTD, Inc. from one of it's underlying carriers for use by the subscriber.

In most cases, Merryville Investments, LTD, Inc. directly manages the TNs used by its subscribers. These numbers are inventoried, assigned, billed and monitored using industry standard methods.

Merryville Investments, LTD, Inc. prevents the it's customers ability to input any TN other than those assigned to the account as outbound caller identity.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Merryville Investments, LTD, Inc., then a rigorous TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Merryville Investments, LTD, Inc. will attest calls originated with these TNs.

Analytics for Monitoring Traffic

Merryville Investments, LTD, Inc. implements computer programs that actively scan traffic patterns, volume, frequency, IP source, device user agent and origination authentication credentials of each subscriber outbound call for irregularities consistent with automated dialing and potentially illegal robocalling. In addition, Merryville Investments, LTD, Inc works closely with it's upstream and downstream providers to detect automated calling consistent with illegal robocalling. Finally, Merryville Investments, LTD, Inc. is an active participant in the Industry Traceback Group.

Call Blocking

Merryville Investments, LTD, Inc. has a 'zero tolerance policy' related to illegal robocalling. Any TN alerted by our internal scans, reported by upstream or downstream provider, reported by the Industry Traceback Group, reported by law enforcement or any court of competent jurisdiction is immediately and summarily suspended pending further investigation. Investigations are swift and biased toward the alert or reporting entity. If, within 24 hours of suspension a subscriber cannot adequately justify the call or calls in question, the subscriber's account is terminated. Further, Merryville Investments, LTD, Inc. will retain TN for a period of 1 year or notice of local number port ("LNP"). In the event of LNP, the TN(s) in question are affixed with notice of our findings in order to alert next provider of previous robocalling violation.

Plan Updates

Merryville Investments, LTD, Inc. recognizes that this plan, FCC regulations and industry best practices must continue to evolve in order to stamp out illegal robocalling. Merryville Investments, LTD, Inc. is committed to implementing industry best practices, FCC compliance and to continuously improve our internal processes to ensure the goal of eliminating illegal robocalling.

Certification

I, Jac Barben, Chief Technology Officer, Merryville Investments, LTD, Inc. do hereby certify the following:

1. Merryville Investments, LTD, Inc. has fully implemented STIR/SHAKEN in the IP portions of its network.
2. Merryville Investments, LTD, Inc. does business as (“DBA”) ClarityTel, VoiceConnect and LP Wireless.
3. Each DBA of Merryville Investments, LTD, Inc. is a participant in the processes and policies of this document.
4. Each DBA of Merryville Investments, LTD, Inc. have the following primary business address:

Merryville Investments, LTD, Inc.
4850 Sugarloaf PKWY
209-356
Lawrenceville, GA 30044

5. The name title, department, business address, telephone number and email address of the individual responsible for addressing robocall-related issues are listed herein.
6. Merryville Investments, LTD, Inc. is a Voice Service Provider.
7. Merryville Investments, LTD, Inc. has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
8. Merryville Investments, LTD, Inc. is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or caller ID spoofing.

Jac Barben
Chief Technology Officer
Merryville Investments, LTD, Inc.