

AireSpring Robocall Mitigation Plan

AireSpring, Inc. (“AireSpring”) submits this Robocall Mitigation Plan (“Plan”) as required by the FCC. In the call chain, AireSpring is an intermediate provider, gateway provider, mobile virtual network operator, or an originating provider. There is no difference in robocall mitigation steps Airespring takes in its capacity as a gateway provider or as a non-gateway voice service provider. The Plan applies to both capacities.

AireSpring takes numerous steps to monitor and mitigate suspected unlawful robocalling traffic on the AireSpring network, as set forth herein.

I. Implementation of STIR / SHAKEN

As both a non-gateway intermediate provider in most instances, and a gateway provider in some instances, AireSpring is required to implement STIR/SHAKEN. AireSpring fully implemented the STIR/SHAKEN authentication framework before the original FCC June 30, 2021 deadline. AireSpring uses STIR/SHAKEN for 100% of the voice traffic on the AireSpring network. Following the STIR/SHAKEN protocol, the AireSpring software adds the appropriate attestation level to the call if the call does not already contain one.

II. Response to Traceback Requests Within 24 Hours

AireSpring automatically forwards an email traceback request from ITG/USTelecom to the relevant AireSpring team members to research and respond, specifically team members in the legal, voice, and executive departments. AireSpring responds to the traceback request within twenty-four (24) hours, as measured beginning from the business hours of the local time for the responding AireSpring office upon receipt of the request from ITG/USTelecom.

AireSpring commits to responding within twenty-four (24) hours to traceback requests from the FCC, law enforcement, and ITG. AireSpring commits to cooperating with such entities in investigating and stopping any robocallers that use AireSpring’s service to carry or process unlawful calls.

Further, AireSpring’s customers are contractually required to cooperate with traceback requests.

III. Automatic Call Blocking Based on Do Not Originate (“DNO”) List

Since prior to 2019, AireSpring has been automatically blocking calls with an ANI that matches an ANI on AireSpring’s internal DNO list. AireSpring builds this list in part in cooperation with some of the larger carriers in the telecom industry, who share suspected spoofed or otherwise suspected ANIs used for fraudulent or bad purposes with AireSpring.

Additionally, AireSpring utilizes telephone numbers in a DNO list AireSpring receives from Somos Enterprise, Inc.

IV. Automatic Call Blocking Based on National Telephone Numbering Plan

AireSpring automatically blocks a call if the originating telephone number (“TN”) does not meet the standard national telephone numbering plan format.

V. Automatic Call Blocking if Telephone Number Not in LERG

AireSpring automatically blocks a call if the originating TN NPA/NXX is not valid per the LERG. Also AireSpring automatically blocks a call if the originating NPA/NXX-X is not valid.

VI. Automatic Call Blocking Based on Real-Time Software Analytics

AireSpring integrates into its network third-party analytics (from YouMail, Inc.), which provides continuous updated data tables for the AireSpring equipment (Sansay softswitch) that then identifies and blocks suspect unlawful robocall traffic in real-time based on the use of voice and other analytics indicating a traffic pattern consistent with unlawful robocalls.

VII. Call Blocking Based on FCC Direction

Should the FCC notify AireSpring of unlawful traffic transiting its network, AireSpring will meet its mandatory obligation to block such traffic. In such instance AireSpring will either block all traffic from the upstream provider(s) identified by the FCC or block such traffic as specifically identified by the FCC. Blocking this traffic will be implemented on AireSpring’s network no later than the time period set forth in FCC regulations, or quicker as is reasonable to do so.

VIII. Know Your Customer Procedures

AireSpring validates upstream providers in the Robocall Mitigation Database. If a provider is not listed or is de-listed, AireSpring rejects the provider, regardless of whether or not the provider is international or domestic. AireSpring does not accept traffic from an intermediate provider, to include a non-gateway intermediate provider, if such provider is not listed in the Robocall Mitigation Database, regardless of the reason such provider is not listed.

AireSpring requires its customers to sign written contracts with AireSpring prior to receiving service. AireSpring collects customer information such as physical business location, contact person(s), and state or country of formation. AireSpring has not found such information helpful for mitigating suspect robocalls because most suspect unlawful traffic coming onto the AireSpring network has come from upstream providers, who in turn have likely received the traffic from other upstream providers. Instead AireSpring relies on analytics reports as described in more detail below.

AireSpring uses analytics reports from a third-party software to determine if the traffic from an upstream provider is likely to contain suspect robocall traffic. AireSpring receives and reviews a daily report of analytics pertaining to suspect robocall traffic. AireSpring management regularly reviews analytics reports both reactively (after a traceback back request from ITG/USTelecom) and proactively (before any reported unlawful activity or traceback requests).

If AireSpring detects suspicious traffic patterns, AireSpring's voice department investigates. If, after investigation and communication with the customer, the activity does not appear legitimate and the customer refuses to or does not adequately correct their practices, AireSpring will disconnect the customer's services.

If AireSpring receives a complaint from another carrier about traffic coming out of AireSpring's network, AireSpring will take the same steps to investigate and resolve the issue.

If AireSpring determines or develops a reasonable belief a customer is using AireSpring's network for an unlawful purpose that may be in violation of the customer's contract with AireSpring, then AireSpring has a contractual right to suspend or terminate the customer account. AireSpring exercises this right based on circumstances.

IX. AireSpring Contact Information

Headquarters address:

AireSpring, Inc.
600 Cleveland Street, Suite 226
Clearwater, FL 33755

Contact for robocall mitigation issues:

Brad Port, Director of Voice Operations
Tel: 818.738.1894
Email: brad.port@airespring.com

X. AireSpring Further Company Information

AireSpring Leadership Team:

Avi Lonstein, Chief Executive Officer
Daniel Lonstein, President and Chief Revenue Officer
Arno Vigen, Chief Financial Officer
Lisa Taranto, Chief Accounting Officer
Russ Shipley, Chief Operating Officer
Tony Lonstein, Executive VP
David Lonstein, Executive VP Product Management
Rod Rummelsburg, General Counsel
Ellen Cahill, Senior VP Marketing
Michael McDaniel, Senior VP Service Delivery
Wendell Nelson, Senior VP Strategic Partnerships
John Young, Senior VP Channel Sales
Roy Pereira, Senior VP Information Technology
David Hess, Senior VP of Mobility

AireSpring, Inc. has no parent company. AireSpring owns:

Airespring Virginia LLC, a Virginia limited liability company
UniPacific BPO, LLC, an Ohio limited liability company

AireSpring OCN Numbers:

996H (DIDs)
259B (Resale provider)
200B (UNI provider)

AireSpring, Inc. is a privately-owned corporation formed and existing under the laws of Delaware. Should the FCC require any further internal Airespring information in connection with the Robocall Mitigation Database, AireSpring respectfully requests any such further information only be made available to the FCC subject to a confidentiality agreement and not subject to public disclosure.

XI. Regulatory / Enforcement

AireSpring is not and has never been prohibited from inclusion in the Robocall Mitigation Database.

AireSpring received a cease and desist letter dated March 22, 2022 (“March 22nd Letter”) from Loyaan A. Egal, Acting Bureau Chief, Enforcement Bureau of the FCC regarding taking steps to prevent AireSpring’s network from continuing to be a source of apparently illegal robocalls from six (6) upstream providers. AireSpring had already blocked all traffic from the 6 identified upstream providers approximately two (2) months before FCC issued the March 22nd Letter. AireSpring responded to the March 22nd Letter accordingly and explained AireSpring’s procedures in mitigating illegal robocalls. To date, AireSpring has received no follow-up letters and no other action from the FCC regarding the March 22nd Letter.

Over the last several years AireSpring has received a number of subpoenas and civil investigative demands (“CIDs”) concerning apparently illegal robocalls traversing AireSpring’s network in AireSpring’s call stream role as an intermediate provider or a gateway provider. The CIDs include i) CIDs commencing December 4, 2021 from the State of Vermont, Office of the Attorney General, ii) CID dated May 27, 2022 from the Federal Trade Commission, and iii) CID dated August 1, 2022 from the Office of the Indiana Attorney General, Consumer Protection Division. In connection with these investigations, AireSpring has not received any notices of apparent liability, forfeiture orders, state or federal lawsuits, criminal indictments, cease and desist letters (other than the FCC letter dated March 22, 2022 mentioned above), fines, other punitive actions, or findings of wrongdoing. AireSpring’s multi-prong procedures to mitigate illegal robocalls, as set forth in this Robocall Mitigation Plan, have proven successful in mitigating such calls.

Using the procedures described in this Robocall Mitigation Plan, AireSpring believes it is taking reasonable and effective steps to ensure that AireSpring’s upstream provider(s) or customers are not using AireSpring’s network to process a high volume of illegal traffic.