

TRUPHONE ROBOCALL MITIGATION PLAN

Version v1.0



TRUPHONE

1. REVISION HISTORY

Version	Date	Change Summary	Author
1.0	01/06/2021	Initial Version	Truphone

2. PURPOSE

Following the announcement by the FCC Wireline Competition Bureau of the availability of the Robocall Mitigation Database, all voice service providers are required to certify their implementation of the STIR/SHAKEN caller ID authentication framework and/or have a robocall mitigation plan ensuring that they are not originating illegal robocalls.

This document defines Truphone's Robocall Mitigation plan for ensuring that all voice traffic originated from Truphone network is validated and monitored for making sure that illegal robocalls are not originated from Truphone's network.

3. TRUPHONE

Truphone acts in the US market as a virtual mobile network operator reselling mobile telecommunications services in the US to its customers. Truphone provide its own services to its own customers.

Truphone is a full MVNO operating its own mobile telecommunications services for which it uses its own core network and its own independent suite of operational support systems.

Truphone currently has less than 100.000 voice service subscribers in the US market and is exempt from the requirements of §64.6301 through June 30, 2023.

4. KNOW YOUR CUSTOMERS (KYC)

Every call originated in Truphone's network is authenticated and validated against a valid service subscription. The service subscription is associated to a given customer which has been identified during the onboarding process and service subscription. During this process, the following customer information is collected and linked to his service subscription:

- Company Name or Person Name
- Company address or Personal Address
- Contact Person (Account Admin when an Enterprise customer)

5. STIR/SHAKEN

Voice traffic originated from Truphone's network will be identified with a valid Telephone Number which will be uniquely associated to the customer subscription profile. Each phone call is authenticated and validated before being routed to the downstream voice peering partner.

Truphone is not providing voice carrier services to 3rd parties, so all voice traffic is originated or destined from/to Truphone's customer base and/or own systems.

Truphone does not have a STIR/SHAKEN certificate yet, but we are working closely with our voice traffic carrier partners so that they are able to attest Truphone voice traffic on behalf of Truphone, in the immediate term.

In parallel, Truphone is assessing what would be required to integrate with the STIR/SHAKEN infrastructure and apply for its own certificate.

6. MONITORING

Truphone actively monitors the voice traffic generated on its network and look for high volume of calls and robocall related patterns. Upon flagging a potential irregular pattern, a further investigation is initiated to assess the exact origin and use of the service which may lead to the temporary service suspension or service termination.

We also have a mechanism in place, provided by our voice traffic carrier partners, which will automatically block Truphone originated traffic in case a robocall pattern is identified.

7. TRACEBACK

We will actively participate in the Traceback community including the FCC, law enforcement, and the industry traceback consortium.