

Robocall Mitigation Plan

Business Information

Cloudli Communications Inc.
2915 Ogletown Road
Suite 2262
Newark, DE 19713

Contact Information

William Ralph Watson III
Vice President Technology
416-350-7132
trwatson@cloudli.com

Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outlines "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that an RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Cloudli Communications Corp. ("Cloudli") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. As certified in the FCC's Robocall Mitigation Database, Cloudli has fully implemented STIR/SHAKEN. In compliance with the R&O, Cloudli submits this RMP and certification.

Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Cloudli in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

New subscribers go through identity verification protocols which are a mixture of algorithmic check and manual call back. A risk score is developed to ensure the authenticity of a new subscriber. This score checks the identity marker collected during an account registration process. These include but are not limited to: name, email address, credit card information and contact phone number. These identity markers are validated for accuracy against public and paid tools. All new subscriber activity is monitored and limited by a Usage Policy designed for new customers. Existing customers are moved to a less limiting Usage Policy as we develop trust that the account is not compromised and is being used for its intended purpose and have a better understanding of their regular usage needs. Usage Policies are always limiting and users that intend to increase usage beyond their policy limits must submit a request to be assigned a new Usage Policy and provide justification.

Acceptable Use Policy ("AUP")

Cloudli maintains an AUP that subscribers must sign before being permitted to use Cloudli's system. Cloudli's AUP is here: <https://www.cloudli.com/terms-of-service>

Know Your Upstream Provider

In accordance with 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. May 19, 2023) ¶¶ 49-51, Cloudli provides the following information concerning its upstream voice service carriers:

Bandwidth.com
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
(855) 864-7776
voicsecurity@bandwidth.com

Lumen Technologies, Inc.
100 CenturyLink Dr.
Mailstop: 3TCW88.2
Monroe LA 71203
Philip Linse
(303) 707-3844
philip.linse@lumen.com

Sinch America, Inc.
7000 Central Parkway
Suite 1480
Atlanta GA 30328
Stacy Graham
(217) 862-1953
stacy.graham@sinch.com

VoIP Innovations
Eight Penn

Center, Suite 100
West Pittsburgh, 15276
support@voipinnovations.com

Cloudli's agreements with its upstream providers contain no provision specific to robocall mitigation. Cloudli has, however, received assurances from those providers that they will, and will continue to, sign calls transmitted to Cloudli, and will work closely with Cloudli to mitigate illegal robocall traffic.

Monitor Traffic With Analytics

Cloudli works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Cloudli detects a calling pattern consistent with illegal robocalls, we will identify the party and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our system.

No third-party vendors are involved in deploying Cloudli's analytics

Investigate Suspicious Activity

Cloudli investigates suspicious activity found by its monitoring systems or reported to Cloudli by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Cloudli contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

Cloudli is familiar with and uses best efforts to follow the Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Cloudli will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

Cloudli has already implemented a Do Not Originate request that it received from the ITG. Cloudli has mechanisms to block suspicious calls using internal analytics. If Cloudli's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Cloudli will take appropriate action which may include suspending or terminating the subscriber's use of Cloudli's network.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Cloudli will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Cloudli will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of William Ralph Watson III

I, William Ralph Watson III, Vice President Technology of Cloudli Communications Inc. ("Cloudli") do hereby certify the following:

- a. Cloudli has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. Cloudli's business name and primary address are as follows:

Cloudli Communications Inc.
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- c. Cloudli's has no other business names in use.
- d. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- e. Cloudli has one owner: CPS Partners Fund LP, which owned 100% of Cloudli.
- f. Cloudli's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- g. Cloudli and its interest holder have not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- h. Cloudli and its interest holder have not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- i. Cloudli's Operator Code Number is 393J.



William Ralph Watson III