

Robocall Mitigation Plan

Business Information

Miron Enterprises, LLC
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Contact Information

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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 (released March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

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

- "know your customer" procedures;
- 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

Miron Enterprises, LLC ("Miron") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates Miron's RMP. Miron is fully STIR/SHAKEN compliant.

Know Your Customer

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to an authentication process. The authentication process uses the following methods associated with a unique subscriber:

1. Telephone number-based caller identity.
2. Unique personal identification number.
3. Username and Password.

A subscriber is an entity that has a business relationship with Miron in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

New Subscribers

All 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 for the following three months specifically further explained in the section X below.

Existing Subscribers

All Subscribers – require updates of Subscriber Information on all their orders. Every order's identity markers are verified again to ensure the account is not compromised and is being used for its intended purpose.

Acceptable Use Policy

Miron maintains an Acceptable Use Policy ("AUP") that subscribers must agree to before being permitted to use Miron's network. Among other things, this AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Miron's service to engage in or in connection with fraudulent activities.

Miron's AUP specifies that Miron may act, including suspension or termination of service, for violation of same.

Know Your Upstream Providers

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, Miron provides the following information concerning its upstream voice service carriers.

Miron has five upstream providers from which it receives voice traffic:

382 Communications Corporation
1017 Turnpike Street
STE 33
Canton MA 02021
Dan Koch
dan@382com.com

Bandwidth Inc
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
voicesecurity@bandwidth.com

Blitz Telecom Services LLC
6150 Metro West Blvd
Suite 208
Orlando FL 32835
Robert Russell
fsufan@dmv.com

Intrado Communications, LLC (d/b/a Flowroute)
11808 Miracle Hills Drive
Omaha Nebraska 68154
Todd Kawamura
tkawamura@flowroute.com

Lingo Telecom, LLC (d/b/a Impact Telecom)
9330 LBJ Freeway
Suite 944
Dallas TX 75243
Alex Valencia
alex.valencia@lingo.com

Miron has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to Miron and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Miron. Miron and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Mitigation During Service

Miron works with its upstream providers to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Miron works with its upstream providers to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

TransNexus is the third party that works with Miron to deploy its analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Miron follows defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Miron follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Miron will devote sufficient resources to provide prompt and complete resources to traceback requests and will respond within 24 hours to all traceback requests.

Miron works with its upstream providers to investigate suspicious activity found by the carrier's monitoring systems or reported to Miron by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Miron contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream providers to block their use of the platform.

For all new and renegotiated Miron contracts governing the transport of voice calls, Miron will use best efforts to contractually require Miron's subscribers to cooperate in traceback investigations by identifying the upstream providers from which the suspected illegal robocall entered our network.

Blocking

Miron will implement Do Not Originate requests it receives from the ITG. Miron has mechanisms to automatically block suspicious calls using internal analytics. If Miron and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Miron will take appropriate action which may include suspending or terminating the subscriber's use of Miron's

service. Miron will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Miron 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, Miron 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.

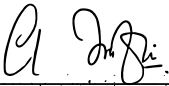
Certification of Abdul T. Molvi

I, Abdul T. Molvi, Chief Financial Officer of Miron Enterprises, LLC. ("Miron"), do hereby certify, under penalty of perjury, the following:

- Miron is fully STIR/SHAKEN compliant.
- Miron's Business name and primary address are as follows:

Miron Enterprises, LLC
4780 Ashford Dunwoody Rd
Ste A236
Atlanta GA 30338

- Miron has one other business name in use: KeepCalling.
- Miron has not previously used any other business name.
- 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.
- Miron's role in the call chain is that of a voice service provider with a STIR/SHAKEN obligation.
- The following individuals have 10% or more ownership of Miron: Florin Miron, Abdul T. Molvi, Daniel Faur, Silvana Tatu.
- Miron's affiliate/subsidiary is Tello LLC.
- Miron has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- Miron is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- Miron's operator company number is 034K.



Abdul T. Molvi