



Business Information

Ahoy Telecom LLC
475 High Mtn Rd, Ste 3
North Haledon, NJ 07508

Contact Information

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Overview

In the Commission's recent 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 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 robocalls.

Purpose

Ahoy Telecom LLC (Ahoy Telecom) is a Voice Service Provider dedicated to stopping illegal calls from originating in our network. As certified in the FCC's Robocall Mitigation Database, Ahoy Telecom has fully implemented STIR/SHAKEN. In compliance with the R&O, Ahoy Telecom submits this Robocall Mitigation Plan 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 Ahoy Telecom in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.



Ahoy Telecom's KYC program involves obtaining specific subscriber information when the customer establishes service. This process includes collecting information such as:

- physical business location(s);
- contact person(s);
- nature of customer's business

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, Ahoy Telecom provides the following information concerning its upstream voice carriers.

Ahoy Telecom receives voice traffic from the following upstream providers:

Bandwidth Inc.
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer, Senior

According to the Robocall Mitigation Database, Bandwidth Inc is fully STIR/SHAKEN compliant and, to the best of Ahoy Telecom's knowledge, information, and belief, Bandwidth Inc has been, and will continue to sign calls transmitted to Ahoy Telecom, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Ahoy Telecom.

Acceptable Use Policy ("AUP")

Ahoy Telecom maintains an AUP that subscribers must sign before being permitted to use Ahoy Telecom's system(s). Among other things, the 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 Ahoy Telecom's service to engage in or in connection with fraudulent activities.

Ahoy Telecom's contractual terms with subscribers specify that Ahoy Telecom may act by suspending or terminating service for violation of the 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 Ahoy Telecom and/or obtained by Ahoy Telecom from one of Ahoy Telecom’s underlying carriers for use by the subscriber.

In most cases, Ahoy Telecom directly manages the TNs used by its subscribers. Ahoy Telecom tracks these numbers in its inventory system and monitors the assignment of these numbers. Ahoy Telecom denies the ability for customers 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 Ahoy Telecom, then 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, Ahoy Telecom will attest calls originated with these TNs.

Analytics for Monitoring Traffic

Ahoy Telecom works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Ahoy Telecom or its carrier partners detect a calling pattern consistent with illegal robocalls, we will identify the party and take appropriate action. 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.

Ahoy Telecom utilizes Sansay NSS (Number-lookup for Stir/Shaken) for TN Attestation and Verification implementation.



Investigate Suspicious Activity

When traffic analysis or automated alerting via Equinix indicates the presence of likely illegal robocalling, Ahoy Telecom's risk prevention team is alerted which follows the 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 or her particular use case and validate that the activity belongs to that subscriber.

Ahoy Telecom follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Ahoy Telecom devotes sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

Ahoy Telecom will implement Do Not Originate requests it receives from the ITG. Ahoy Telecom has procedures to block suspicious calls. If Ahoy Telecom identifies suspected robocalling patterns that are confirmed with further investigation, Ahoy Telecom will take appropriate action which may include suspending or terminating the subscriber's use of Ahoy Telecom's systems. Ahoy Telecom will cooperate with investigative bodies, provide a single point of contact to address traceback requests from law enforcement, including state attorneys general offices, FCC, and ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Ahoy Telecom 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, Ahoy Telecom 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 Giovanni Indomenico

I, Giovanni Indomenico, Chief Information Officer of Ahoy Telecom, LLC (“Ahoy Telecom”) do hereby certify, under penalty of perjury, the following:

- (1) Ahoy Telecom has fully implemented STIR/SHAKEN in the IP portions of its network
- (2) Ahoy Telecom’s business name and primary address are as follows:

Ahoy Telecom LLC
475 High Mountain Rd, Suite 3
North Haledon, NJ 07508

- (3) Ahoy Telecom has no other business names in use.
- (4) Ahoy Telecom has previously used the business name “Techsitters”.
- (5) 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.
- (6) Ahoy Telecom’s role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (7) Ahoy Telecom has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (8) Ahoy Telecom is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Giovanni Indomenico
Chief Information Officer