

Robocall Mitigation Program
ALLO Communications LLC
FRN 0010480978

FCC Public Notice DA 24-73 announces the Robocall Mitigation Database filing deadlines and additional compliance instructions. Allo Communications is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. As of 12/31/2021 ALLO Communications has implemented STIR/SHAKEN in conjunction with Neustar/Transunion on the IP portions of the Allo Communications voice network. In addition to STIR/SHAKEN, Allo performs robocall mitigation for all IP and TDM voice traffic.

This document provides the additional information required by FCC Public Notice DA 24-73 and defines the ALLO Robocall Mitigation Program that ALLO Communications will be following to combat unlawful Robocalls in accordance with the FCC Robocall Mitigation and certification requirements.

Additional Information required by FCC Public Notice DA 24-73

- 1) Allo Communications is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- 2) Allo claims no extension for the STIR/SHAKEN implementation.
- 3) No additional Principals, Affiliates, Subsidiaries, Parent Companies other than Allo Communications.
- 4) Allo Communications is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing and provide information concerning any such actions or investigations.
- 5) Allo Communications OCN is 710A

ALLO Robocall Mitigation Program

1) Measures to prevent the origination of illegal robocalls

- Neustar Robocall Mitigation service
Using the existing Neustar CNAM infrastructure and data analytics, this service identifies invalid and unassigned telephone numbers for authoritative blacklist as well as identifying legitimate telephone numbers for authoritative whitelist.
- Metaswitch source based translations mitigation
Using the Metaswitch files based dynamic translations, this service blocks the following types of calls from originating or terminating on the ALLO network.
 - Invalid non-Telcordia formatted telephone numbers
 - Poorly rated telephone numbers (99-100) based on Neustar CNAM analytics
 - Any illegal robocallers or TDOS attackers based on validated reports
- Additional mitigation services being implemented
 - Neustar Strategic Caller
 - Neustar STIR/SHAKEN call authentication

- Equinox Protector analytics service (live call pattern monitoring)
- Provisioning processes and database monitoring
 - ALLO subscriber Calling Party Numbers must be ALLO owned telephone numbers.
 - ALLO PBX business/enterprise customers must include ALLO owned telephone numbers in P-Asserted ID of call. Calling Party Numbers must be owned by the respective business/enterprise.
- End-user customer validation, vetting, and contractual provisions
 - All end-user customers are vetted for reputation at time of contract origination and renewal.
 - Business/enterprise customers must prove ownership of any non-ALLO phone numbers to be used in call processing.

2) ALLO Response to Traceback Requests

- ALLO participates in the Industry Traceback Group/Consortium. Allo commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers.
- ALLO has a process in place to investigate and identify fraudulent calls originating on the ALLO network whether they be identified via Traceback or through pre-emptive monitoring.

3) ALLO commitment and cooperation to stop illegal robocallers

- ALLO commits to block any customer from originating illegal calls on the ALLO network.
- Any ALLO customer that is identified as an illegal robocaller will be suspended from originating calls on the ALLO network.
- The Metaswitch source based translations mitigation allows ALLO to block any telephone number identified as an illegal robocaller from completing calls either originating or terminating on the ALLO network.

4) Universal Robocall Mitigation Database Filing Obligation

- All calls that Allo originate on our network are subject to our robocall mitigation program.
- No prior certification has been removed by Commission action and Allo has not been prohibited from filing in the Robocall Mitigation Database. Allo has fully implemented STIR/SHAKEN on the IP portions of our voice networks.
- Allo's robocall mitigation plan describes the specific "reasonable steps" Allo has taken to avoid the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation program as described in FCC Public Notices DA 21-454 and DA 24-73.