

Robocall Mitigation Plan

Business Information

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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"), including those that are fully STIR/SHAKEN compliant, 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 the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

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

Know Your Customer ("KYC")

New Aculab subscribers must provide name, telephone number, email address, and country. Subscribers putting money onto the Aculab platform ("platform"), a requirement in order to place outbound PSTN calls, must also provide their credit card number and associated information. New subscribers have their outbound calls rate-limited to one per second, and human contact via phone call or in-person is required in order to increase that rate. New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones validated through automated-number-validation voice call. All pay-by-card subscribers have limits placed on the number of payments they may make per day and the size of those payments. Both are kept low unless we have had human contact with the customer via phone call or in-person. Pay-by-invoice is allowed only for subscribers who we know well, with human contact via phone call or in-person at the very least, and credit and associated checks having taken place.

Aculab is a small company, we have a small number of customers. We know our customers and understand their use cases.

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, Aculab provides the following information concerning its upstream voice carriers.

Aculab has two upstream providers from which it receives voice traffic:

- 1) Lumen
111 N Canal Street, Chicago, IL 60606
Christina Perdikis
christina.perdikis@lumen.com
- 2) Bandwidth Inc.
900 Main Campus Drive, Suite 100
Raleigh, North Carolina 27606
Michael Service
mservice@bandwidth.com

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

Acceptable Use Policy

Aculab maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use our network. This AUP prohibits:

- using our service for any illegal purposes whatsoever;
- engaging in activity for which FCC or any equivalent national regulatory authority, has restricted or regulated in relation to proper use of the public telephony network or the Internet;
- using our service if Aculab determines, at its sole discretion, that its provision for this customer is prohibited by applicable law or has become impractical or unfeasible for any legal or regulatory reason; and
- using our service to offer or otherwise make available to others fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones verified through automated-number-validation voice call. Subscribers can sign a form allowing them to use Caller IDs not purchased through our platform or verified by validation call for outbound calls, functionality that is restricted to customers with whom we've had human contact by phone call or in-person. This form:

- prohibits the sending of outbound traffic via the PSTN with Caller IDs not owned by the customer or the customer's subscribers; and
- states that, if Aculab receives notice that the Customer's outbound calls through our platform are deemed to be spam, Aculab has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

Aculab works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls 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 network.

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

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Aculab'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.

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

Blocking

Aculab will promptly respond to Do Not Originate requests it receives from the ITG. Aculab has mechanisms to automatically block suspicious calls using internal analytics. If Aculab's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Aculab will take appropriate action which may include suspending or terminating the subscriber's use of Aculab's network. Aculab will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and 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. Aculab 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, Aculab 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 Rob Medved

I, Robert Medved, Chief Financial Officer of Aculab Inc. ("Aculab") do hereby certify, under penalty of perjury, the following:

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

Aculab Inc
27 Madison Ave Suite 040
Paramus, NJ, 07652

- (3) Aculab has no other business names in use.
- (4) Aculab has not previously used any other business name.
- (5) Aculab is a subsidiary of Aculab LTD.
- (6) The following persons are Aculab's directors: Robert Medved and Vinh Lien.
- (7) None of the persons/entities in items 5 – 6 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (8) 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.
- (9) Aculab's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (10) Aculab has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) Aculab is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) Aculab's Operator Code Number is 447K.



Robert Medved