

Robocall Mitigation Plan

Business Information

Tello, LLC
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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 (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

Tello, LLC ("Tello") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. Tello is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Tello was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as Tello now file RMPs. This document delineates Tello's RMP. Because Tello does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, Tello works closely with its upstream provider to carry out the required mitigation functions.

Know Your Customer

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 Tello in which we transmit calls based on behalf of the subscriber by reselling service bought in bulk from our upstream provider.

All new subscribers have their identity confirmed by Tello by verifying the subscriber's name, email address, ensuring the validity & location of the email address as well as uploading the email address into Tello's fraud detection system.

Acceptable Use Policy

Tello maintains an Acceptable Use Policy ("AUP") that subscribers must agree to before being permitted to use Tello'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 Tello's service to engage in or in connection with fraudulent activities.

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

Mitigation During Service

Tello works with its upstream provider 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

Tello works with its upstream provider 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).

No third party is involved in deploying Tello's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Tello works with its upstream provider to follow 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.

Because Tello does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Tello's analytics.

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

Tello will respond to traceback requests within 24 hours of receiving same.

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

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

Blocking

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

- (1) Tello, LLC ("Tello"), by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) Tello's Business name and primary address are as follows:

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- (3) Tello has no other business names in use.
- (4) Tello has not previously used any other business name.
- (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) Tello's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (7) Tello has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (8) Tello is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (9) Tello's operator company number is 098K.

/s/ Abdul T. Molvi