

Robocall Mitigation Plan

Imagine Networks LLC is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

Imagine Networks LLC purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290) who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to Imagine Networks LLC.

STIR/SHAKEN Extension

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

International Subscribers

Imagine Networks LLC does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

Imagine Networks LLC maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Imagine Networks LLC's broadband or voice services. Among other things, this AUP prohibits: using the service in connection with fraudulent activities and violating any local, state, or federal law.

Traceback Requests

Imagine Networks LLC is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the industry traceback consortium. Furthermore, Imagine Networks LLC is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Imagine Networks LLC service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to Imagine Networks LLC@Imagine Networks LLC for immediate processing by Imagine Networks LLC.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by Imagine Networks LLC or our wholesale partner Atheral LLC, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to Imagine Networks LLC of authorization to use a TN, documentation will be provided to Atheral LLC so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, Atheral LLC uses TransNexus's ClearIP solution to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Atheral will immediately ask Imagine Networks LLC to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Imagine Networks LLC or Atheral LLC determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Atheral LLC has committed to Imagine Networks LLC that on or before December 31st, 2021 that they expect to be authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on our network. Imagine Networks LLC has every confidence Atheral LLC will meet the June 30th, 2023, deadline provided by the exemption granted.