

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	)	
	)	
Advanced Methods to Target and	)	CG Docket No. 17-59
Eliminate Unlawful Robocalls	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**Certification of Logical Telecom, LP in Support of
Second Updated Robocall Mitigation Program**

I, Raul Cardenas, hereby certify that I am a Partner of Logical Telecom, LP (“Logical”). I further certify, based on my personal knowledge, that the statements and information contained in this certification and in its accompanying Second Updated Robocall Mitigation Program (attached hereto) are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with internal Logical subject-matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

Logical certifies that all of the calls that originate on its network are subject to a robocall mitigation program consistent with Commission requirements, including 47 CFR §64.6305; that any prior certification has not been removed by Commission action; that the Company has not been prohibited from filing in the Robocall Mitigation Database by the Commission; and that Logical has fully implemented STIR SHAKEN on the IP portions of its networks.

Logical is not subject to any extension under 47 CFR 64.6304.

Logical certifies that it will respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate, carry, or process illegal robocalls calls.

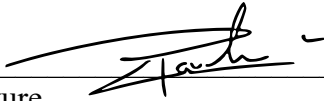
Logical certifies that it will not add any Line-Item Charges to customer accounts for call authentication technology in accordance with 47 CFR 64.6307.

Pursuant to 47 C.F.R. §1.16, I certify under penalty of perjury that the foregoing is true and correct. Executed on:

02/06/2024

Date

Signature

A handwritten signature in black ink, appearing to read "Raul A. Cardenas", written over a horizontal line.

Raul A. Cardenas

Print Name

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER
IN WC DOCKET NO. 17-97 BEFORE THE FEDERAL COMMUNICATIONS
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HIGHLY CONFIDENTIAL DOCUMENT – REDACTED PUBLIC VERSION

**SECOND UPDATED ROBOCALL MITIGATION
PROGRAM OF LOGICAL TELECOM, LP**

Logical Telecom, LP's ("Logical" or "Company") Second Updated Robocall Mitigation Program ("Program"), in accordance with Section 64.6305 of the Commission's Rules and Public Notice DA 24-73, WC Dkt. No. 17-97, rel. Jan. 25, 2024, is set forth below. All calls originating from Logical's prepaid platform are subject to the specific reasonable steps to avoid originating illegal robocall traffic set forth in this Program. Logical fully implemented STIR SHAKEN in 2022.

Logical has requested in WC Docket No. 17-97 that portions of its Program contents and Certification in Support of Second Updated Robocall Mitigation Program be treated as a "Highly Confidential Document" pursuant to the Commission's *Protective Order* in WC Docket No. 17-97, released Oct. 14, 2021.

A. DESCRIPTION OF NETWORK

A small originating voice service provider, Logical offers a range of specialized and low cost prepaid mobile "pinless" products connecting family and friends in the U.S. and in Mexico, Central America and other countries.¹

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Virtually all of the Company's traffic terminates outside of the NANP.³

B. ROBOCALL MITIGATION PROGRAM OF LOGICAL

Logical uses the following specific "reasonable steps" to avoid the origination, carrying or processing of illegal robocall traffic as part of its robocall call mitigation program.



2. Logical's Third-Party Agreements Address Illegal Robocalling. Logical's retail portal agreements give it unlimited ability to immediately terminate, without prior notice, retail outlets which the Company associates with illegal robocalling activity. These terms also require retail outlets to promptly notify Logical of any suspected illegal robocalling activity that may be associated with its products. Further, the Company's

³ Logical is a *de minimis* provider for USF purposes and does not complete intrastate calls.

⁴ "Subscriber vetting" and "telephone number validation" are "best practices" established by the Commission for combatting illegal robocalling. See Public Notice, DA 20-1526, rel. Dec. 22, 2020, Wireline Competition Bureau Issues Caller ID Authentication Best Practices, WC Dkt. Nos. 17-97 and 20-324 at 11. See also 47 CFR 64.6305(d)(2)(ii).

⁵ When a customer calls the same destination number three times, the system creates a speed dial entry on the customer's account and saves the frequently used destination number. The customer is notified with a new domestic access number to the "pinless" platform. When the customer dials the new access number, the call is connected directly to the international destination number.

⁶ A call will also be blocked if the call does not additionally authenticate with a prepaid balance and pre-selected product.

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agreements with distributors require them to immediately notify Logical upon becoming aware of actual or potential reports of illegal robocalling activity.

3. Logical Does not Offer Services or Features Generally Associated with Illegal Robocalling. Logical does not offer specific services that can facilitate a large volume of calls. Its switch cannot process calls from a fax machine or computer—it can only process a “known” customer with a Caller ID and a positive balance on a specific prepaid product who follows system prompts to enter the destination number. The Company does not provide services to enterprise or business customers.
4. Logical has not Experienced Illegal Robocalling Through its Platform. Logical, to the best of its knowledge, has not experienced robocalling through its IP platform. To the best of its knowledge, Logical has never received a complaint from a federal or state regulatory authority about illegal robocalls originating from its platform. This record validates the effectiveness of the Company’s platform in preventing unlawful robocalls.
5. Description of Principals, Affiliates, Subsidiaries, and Parent Companies (from Robocall Mitigation Database certification). The general partner of Logical is RAC Logical Management, LLC with a 1% equity interest. Logical limited partners are Raul Cardenas and Ricardo Cardenas, with 54.5% and 44.5% direct equity interests in Logical respectively, and 55% and 45% direct equity interests in RAC.