

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Call Authentication Trust Anchor

WC Docket No. 17-97

**CERTIFICATION OF COMPLIANCE AND
REVISED ROBOCALL MITIGATION PLAN**

for

**GoCo Technology Inc.
GoCo Technology (U.S.) Inc.**

Submitted by:

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February 22, 2024

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Call Authentication Trust Anchor

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**CERTIFICATE OF COMPLIANCE AND REVISED ROBOCALL MITIGATION PLAN
FOR GOCO TECHNOLOGY INC. AND GOCO TECHNOLOGY (U.S.) INC.**

GoCo Technology Inc., (“GoCo Canada”)¹ and GoCo Technology (U.S.) Inc., (“GoCo US”)² (collectively, “GoCo”), respectfully submit this revised Robocall Mitigation Plan (“Plan”) to the Federal Communications Commission (“FCC” or “Commission”) as required under 47 C.F.R. § 64.6305(d) and in accordance with the Commission’s January 25, 2024, Public Notice in the above-referenced proceeding. GoCo’s initial Plan was submitted on June 28, 2021, when both entities registered with the Commission’s Robocall Mitigation Database. A revised Plan was filed on June 12, 2023.

GoCo Canada (FRN 0031-0266-85) is a foreign voice service provider incorporated under the laws of British Columbia, Canada. GoCo Canada provides unified communications (UC) solutions, network management services, network security solutions, VoIP, data, and related communications products and services to enterprise customers and resellers in Canada. GoCo Canada's VoIP capabilities are enabled by Tier 1 providers as the company does not have facilities in Canada. For both origination and termination services in Canada, GoCo Canada uses carrier SIP

¹ GoCo Technology Inc. does not operate under the name “GoCo Canada” nor is it registered with the FCC under this name. “GoCo Canada” is being used for this filing for jurisdictional clarification purposes only.

² GoCo Technology (U.S.) Inc. does not operate under the name “GoCo US” nor is it registered with the FCC under this name. “GoCo US” is being used for this filing for jurisdictional clarification purposes only.

trunking services from its parent company, TELUS Communications Inc. (“TELUS”) (FRN 0004-9899-76),³ one of Canada's Tier 1 providers. Additionally, in case of an emergency or temporary service outage within the TELUS network, GoCo Canada mainly uses carrier trunking services from alternate Tier 1 Canadian carriers such as Bell Canada for termination services in Canada. While GoCo has the basic STIR/SHAKEN framework implemented within its immediate domain, it is also working closely with TELUS to enforce implementation on the upstream traffic and to ensure proper authentication of traffic occurs for cross-border traffic (Canada-United States) at handoff.⁴

GoCo US (FRN 0030-0166-87)⁵ is a small voice service provider incorporated under the laws of Delaware. GoCo US provides UC solutions, VoIP, managed network services, data and related communication services to enterprise customers in the United States as well as supports the US portion of services for GoCo Canada’s enterprise customers’ US operations. Like GoCo Canada, all of GoCo US’ interconnected VoIP capabilities are enabled by third party IP-voice providers in the United States. GoCo US works with its third party underlying service providers to ensure proper handoff of traffic as required. GoCo US does not have facilities in the United States and does not have control over how calls are routed once they leave the UC environment. Any call identifying information passed on by the third party providers to other US carriers is required to be in compliance with the Commission’s STIR/SHAKEN framework.

³TELUS Communications Inc. is registered with the FCC’s Robocall Mitigation Database as a foreign voice service provider. TELUS Communications Inc. is also the indirect parent company of GoCo US.

⁴ Currently there is no formal agreement between Canada and the United States to support key exchange for cross-border traffic. GoCo traffic originating in Canada and enabled by TELUS meets the STIR/SHAKEN requirements set forth by the Canada Radio-television and Telecommunications Commission (“CRTC”).

⁵GoCo US operates under an International Section 214 Authorization held by its ultimate parent, TELUS Corporation (FRN 0008-8098-32), a British Columbia corporation headquartered in Vancouver, British Columbia, Canada. See ITC-214-MOD-20061016-00567, Section 63.21(h) Notice filed on October 28, 2020. TELUS Corporation does not provide voice services in the United States or Canada.

GoCo takes the issue of robocalls seriously and ensures that its traffic is in compliance with requirements set forth by the Commission's STIR/SHAKEN framework. GoCo has an internal team of subject matter experts that investigate and respond to requests from the industry traceback consortium, the FCC, law enforcement or other governmental authorities. GoCo will continue to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry or process illegal robocalls. GoCo is committed to responding fully and within 24 hours to all traceback requests it receives and will continue to be an active participant in the process where required.

GoCo has developed its own tools to help prevent unwanted calls. Within GoCo's UC platform, customers may input specific telephone numbers to prevent those numbers from passing through the system for completion. GoCo works with its inbound telecommunications carrier partners to ensure blocked numbers do not reach the requesting business customer. This feature is provided at no cost to the customer. In addition, GoCo does not use third party vendors to perform call analytics, any network analytics are performed within the GoCo environment.

GoCo knows its carrier partners and has well established procedures for verifying its customers, including the gathering and reviewing of information such as the customer's physical business location, contact person(s), and when appropriate, credit worthiness, and taxing authority information. GoCo maintains detailed acceptable use policies for its products and services, outlining what actions it may take should customers or resellers (and their end users) violate these policies, including originating illegal or unwanted robocalls.⁶ GoCo includes language in its agreements and term sheets prohibiting the use of its service for illegal activities and/or in violation

⁶ See, e.g., <http://www.goco.ca/aup> at 1 "While using the Communication Services, the Customer is prohibited from ... engaging in or assisting others to engage in any criminal offence."

of its acceptable use policy. Customers are made aware of these policies when signing up for service. These policies are available on the company's website.⁷

GoCo is committed to stopping illegal robocalls and has put in place the resources necessary to respond to traceback requests and to cooperate with any investigation, including any Notification of Suspected Illegal Traffic inquiry issued by the FCC's Enforcement Bureau.

The required contact information is as follows:

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In accordance with Section 1.16 of the Commission's regulations, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted,



Erin Emmott, President
GoCo Technology (U.S.) Inc.

⁷ <http://www.goco.ca/aup>.