

IPro Media, Inc.

Robocall Mitigation Plan

December 12, 2024

Introduction. IPro Media, Inc. ("IPro"), pursuant to Sections 64.6301 and 64.6305 of the Commission's rules, 47 C.F.R. §§ 64.6301, 64.6305 and the Commission's "Best Practices" as amended, adopts this Robocall Mitigation Plan ("Plan"). This Plan is current as of its submission date and may be subject to changes as necessary to further comply with amended Commission regulations and requirements.

This document sets forth the Provider's current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting "reasonable steps" to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

STIR/SHAKEN Implementation. IPro's network carriers have fully implemented STIR/SHAKEN.

Extension. IPro falls under a plain language definition of a Small Voice Service Provider, pursuant to Section 64.6304(a)(2) of the Commission's rules, 47 C.F.R. § 64.6304(a)(2), and has received extensions pursuant to that Section.

Company Contact. The name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues is as follows:

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Corporate Information. IPro is a privately-owned corporation. The Company's principals exert full control over IPro's operations. IPro is not affiliated with any other entity that provides telecommunications or communications services. IPro does not operate under any assumed names.

IPro operates as a non-facilities-based Small Voice Service Provider as defined, with a STIR/SHAKEN implementation obligation directly serving end-users as set forth herein. IPro is not a foreign voice service provider, is not an intermediate or gateway provider, and does not act as a wholesale provider originating calls on behalf of another provider or providers. IPro does not maintain an operating company number and does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

Certification. IPro certifies that it has not been prohibited from filing in the Robocall Mitigation Database. IPro certifies that it independently reviews its underlying carrier subscriber traffic analytics and does not separately engage a third-party analytics provider.

Reasonable Steps to Prevent Robocalling.

Know Your Customer and Upstream Provider

IPro follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

IPro fully vets all subscribers before providing service to the subscriber. IPro obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. Further, IPro compares information provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. Subscribers are served under a service agreement.

IPro monitors its subscribers' traffic for call, originating number and terminating number irregularities in conjunction with its underlying carriers, and should irregularities be determined, will immediately contact the subscriber as part of its investigatory process.

IPro's network carrier confirms that the upstream provider has a certification in the Robocall Mitigation Database and will not accept voice traffic from an unregistered provider. IPro's network carrier's contractual provisions with upstream providers prohibit them from sending illegal robocalls.

Telephone Number Validation

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). In accord with industry best practices, the Provider has procedures in place to confirm the calling customer's right to use a telephone number. Specifically, a subscriber of the Provider's services is permitted to use a telephone number as their caller identity if a number is directly managed by the Provider and/or obtained by the Provider via an underlying partner.

Network Traffic Investigation and Traceback Requests

Consistent with its commitment above, IPro will respond fully to all traceback requests from the Commission, law enforcement, and the industry traceback consortium as soon as possible and at no time exceeding 24 hours from the time of the request and will cooperate with such entities

in investigating and stopping any illegal robocallers that use its service to originate calls.

As a non-facilities-based voice service provider, IPRO coordinates with its underlying carriers to monitor IPRO's subscribers' traffic, identify traffic anomalies including, but not limited to, unusually high call volumes to different telephone numbers and disparate geographic areas, over the course of one or more hours, for which IPRO will investigate, and to immediately block subscriber service if robocalling is suspected. Confirmation of illegal activity will result in immediate subscriber service termination.

The Provider monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns consistent with illegal robocalls are detected or the Provider otherwise suspects illegal robocalling or spoofing is taking place on its network, it immediately seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action.

Refusing Traffic from Unlisted Providers.

In conjunction with its underlying carriers, IPRO refuses to accept traffic from unlisted and de-listed providers from the Commission's Robocall Mitigation Database.

History of Robocall Mitigation Plan Investigation and Enforcement

IPRO is a respondent to enforcement action in Docket Number EB-TCD-24-00036891, *In the Matter of 2,411 Robocall Mitigation Database Filers*. Paragraph 7 of that Order directed IPRO to cure its deficiency by updating its certification and submitting an updated robocall mitigation plan. This robocall mitigation plan and its corresponding certification cure the deficiencies in IPRO's prior certification. Paragraph 11 further ordered IPRO to file a written response to that Order, which IPRO filed separately. IPRO has no further history of robocall mitigation plan investigation and enforcement.

Ongoing Robocall Mitigation.

I PRO, in conjunction with its underlying carriers, will implement a call authentication protocol for voice calls delivered over the non-IP portions of its network that do not use SIP technology when such a protocol is fully developed and finalized by industry standards and the necessary equipment and software is available on the commercial market.

I PRO anticipates that its Plan will evolve as it makes Plan enhancements, as underlying carriers enhance their own plans, and as the Trust Anchor and industry generally gain experience in caller ID authentication protocols.

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