

Robocall Mitigation Plan

Business Information

Skywave Wireless, Inc. ("Skywave")
121 S Main St.
West Point, NE 68788

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 (rel. 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.

Skywave is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. As certified in the FCC's Robocall Mitigation Database, Skywave has fully implemented STIR/SHAKEN.

Know Your Customer ("KYC")

Skywave is a small local company that provides voice service directly to identifiable business and residential end users. Skywave does not knowingly provide anonymous or wholesale voice origination services. Before activating voice service, Skywave gathers and verifies customer information through its staff, including the customer's identity and contact information, service address, physical location where the number will be used, intended use of the service, and E911 service address.

Information collected and verified includes, as applicable:

- Business name or Residential name
- Business address or Residential address
- Contact Name
- Contact Email Address
- Contact Cell Phone Number
- Physical location of where the number is to be used
- Verified E911 service address matches the installed physical service location

Know Your Upstream Providers

In accordance with the Commission's directive in Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice

of Inquiry in CG Docket 17-59 (Rel. May 19, 2023) ¶¶ 49-51, Skywave provides the following information concerning its upstream voice service carrier.

Skywave has three upstream providers from which it receives voice traffic:

1) Commio.io
5420 Wade Park Blvd.
Suite 100
Raleigh, NC 27607
sales@commio.com

2) Sangoma.com (Voipinnovations)
445 Jan Davis Drive NW
Huntsville, AL 35806
1-877-344-4861

3) Atheral
1309 Coffeen Ave
Ste 5838
Sheridan, Wyoming 82801
1-702-470-2770

Skywave has received assurances from its upstream providers that they comply with applicable STIR/SHAKEN and robocall mitigation requirements for voice traffic they provide to Skywave. Skywave knows the providers from which it directly receives voice traffic and takes reasonable steps to ensure those providers comply with applicable Commission requirements. Skywave and its upstream providers cooperate in responding to traceback requests and efforts to identify and stop illegal robocall traffic.

Acceptable Use Policy ("AUP")

Skywave prohibits the use of its voice services for illegal or unauthorized robocalling. Legitimate automated calling, such as appointment reminders, notifications, or other lawful customer communications, may be permitted. Skywave reserves the authority to monitor traffic patterns as part of its routine business operations. If Skywave determines that its service is being used for illegal or unauthorized robocalling, it may suspend or disconnect the service without prior notice.

Skywave prohibits the use of its voice services for wholesale purposes. Specifically, Skywave's voice service cannot be utilized in conjunction with Softswitches or Call Routers to distribute phone service from a provider to their customers in a wholesale or resale capacity. This service is intended for registration to a single PBX/Phone System directly owned by a customer, strictly for internal use. Trunking services are not to be employed for purchasing or transferring numbers to another service provider. Skywave reserves the right to determine, at its discretion, if the service is being procured or utilized in violation of this policy, based on analysis of customer traffic, purchasing habits, and cancellations within the normal course of business.

Skywave prohibits the use of its voice services to originate unlawful artificial intelligence-generated or artificial intelligence-simulated voice calls. Customers are responsible for complying with all applicable consent, disclosure, identification, and other legal requirements governing such calls.

Telephone Number Authorization

Skywave only allows use of Caller IDs that it has verified within its systems. Subscribers can use their own systems to produce Caller IDs that they can legally use. If Skywave for any reason deems the subscriber is falsely using a Caller ID, it will have the right to disconnect service immediately.

Analytics for Monitoring Traffic

Skywave monitors calling activity for patterns that may indicate illegal robocalling. Skywave has access to call detail records (CDRs) and can review information including call volume, call duration, destinations, originating customer or account, Caller ID information, and changes from a subscriber's normal calling patterns. When suspicious activity is identified, Skywave investigates the source and takes appropriate measures. These measures may include reviewing CDRs, validating the originating subscriber and Caller ID, contacting the subscriber regarding the activity, and suspending or terminating the subscriber's ability to place calls on Skywave's network.

No third-party vendors are involved in deploying Skywave's analytics.

Investigate Suspicious Activity

When traffic analysis suggests potential illegal robocalling activity, Skywave adheres to established procedures for investigating such subscribers. These procedures include, but are not limited to:

- Reviewing recent and historical call detail records to compare against expected patterns.
- Examining recent account activity and purchases.
- Investigating any potential system issues that may be causing unusual behavior.
- Validating the legitimacy of the call origination path.
- Contacting the subscriber to discuss their specific use case and confirm the legitimacy of the activity associated with their account.

Skywave adheres to the recommended best practices of the Industry Traceback Consortium (ITC) and participates in traceback and trace forward investigations. Skywave commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, and the Industry Traceback Consortium, and to cooperate with those entities in investigating and stopping any person or entity from using Skywave's network or services to transmit illegal robocalls.

Blocking

Skywave commits to promptly responding to applicable Do Not Originate (DNO) requests received from the ITC or other authorized sources. If Skywave detects suspected illegal robocalling patterns and confirms them through further investigation, appropriate action will be taken, which may include suspending or terminating the subscriber's network access. Skywave will cooperate with investigative bodies, including law enforcement, state attorneys general, the FCC, and the ITC, and will maintain a designated point of contact for traceback requests. Skywave will document traceback requests, DNO requests, investigations, and responsive actions as appropriate.

Plan Updates

Skywave recognizes the need for continuous improvement in addressing the evolving challenges of illegal robocalling. It will monitor applicable FCC requirements and industry best practices and refine internal processes accordingly. Any significant changes to information required in Skywave's Robocall Mitigation Database filing will be reflected in an updated filing within ten (10) business days, as required by the Commission's rules. Skywave will also review its Robocall Mitigation Database filing at least annually and submit the annual recertification required by the Commission on or before March 1.

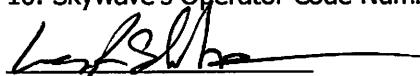
Certification of Craig Schmaderer

I, Craig Schmaderer, the CEO of Skywave, do hereby certify, under penalty of perjury, the following:

1. Skywave has fully implemented STIR/SHAKEN.
2. Skywave's Business name and primary address are as follows:

Skywave
121 S Main Street
West Point, NE 68788

3. Skywave has no other business names in use.
4. Skywave has not previously used any other business name.
5. Skywave consists of two owners, Craig Schmaderer and Ryan Kuester
6. Neither of the persons in item 5 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
7. Skywave's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
8. Skywave has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
9. Skywave is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
10. Skywave's Operator Code Number is 093K


Craig Schmaderer