

## **Robocall Mitigation Plan**

### Business Information

Simple Fiber Communications LLC  
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888-455-0151

### Contact Information

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### Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (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;
- "know your upstream provider";
- ownership information;
- 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.

### Purpose

Simple Fiber Communications LLC ("SimpleFiber") 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, SimpleFiber has fully implemented STIR/SHAKEN. In compliance with the R&O, SimpleFiber submits this RMP and certification.

### Know Your Customer ("KYC")

SimpleFiber uses best practices to identify and verify caller identity by using the NANC Best Practices for the Implementation of Call Authentication Frameworks Section 3.1 (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

For new customers, we gather the following information:

- phone number
- email

- physical address; and
- tax ID.

Upstream traffic is only allowed from IP addresses that have been given to us by our providers. Customers with traditional VoIP phones are only allowed to select from numbers in their inventory as outbound Caller ID. SIP trunk customers are authenticated via IP address or SIP credentials.

All accounts and SIP registrations are password-protected. Device configuration files are protected by passwords and the registration IP address of the SIP account in that configuration file. So, if another device is already using the SIP account contained in that file, we will reject that request even if it has the proper username and password for the requested file unless it is coming from the same IP address as the registered device for that SIP account.

Additionally, we utilize ApiBan to scan for SIP attacks and automatically block IP addresses. Each customer has set call limits based on size.

Human contact via phone call or in-person is required in order for new subscribers to gain access to the SimpleFiber platform ("platform") to make outbound calls. Subscribers deposit money into the platform via pay by invoice, which is a requirement before a subscriber can place outbound PSTN calls. A subscriber must provide payment through one of the following methods:

1. by phone, calling our toll-free number.
2. by check via mail.
3. online via our payment site.
4. through autopay by filling out our ACH form and providing the required information.

SimpleFiber is a small company and we have a small number of customers. As a result, we know our customers and understand their use cases.

#### Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls*, and *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, 38 FCC Rcd 5404 (2023), at ¶¶ 49-51, SimpleFiber provides the following information concerning its upstream voice service carrier.

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

1. Bandwidth  
2230 Bandmate Way  
Raleigh, NC, 27607  
Luke Stowers  
lstowers@bandwidth.com
2. Telnyx  
311 West Superior St  
Suite 504  
Chicago IL 60654  
regulatory@telnyx.com

3. thinQ Technologies, Inc d/b/a Commio  
5420 Wade Park Blvd  
Suite 100  
Raleigh NC 27607  
legal@commio.com

SimpleFiber has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to SimpleFiber and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to SimpleFiber. SimpleFiber and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

#### Acceptable Use Policy ("AUP")

SimpleFiber maintains an AUP that subscribers must agree to before being permitted to use its software and services. Among other things, the AUP prohibits:

- using our service for any illegal purposes whatsoever;
- autodialing, continuous or extensive call forwarding, continuous connectivity, constant dialing, iterative dialing, excessive short duration calls, excessive no answer calls, fax broadcast, fax blasting, telemarketing or any other activity that would be inconsistent with small business usage;
- using our service if SimpleFiber determines, in its sole discretion, that provision for a customer is prohibited by applicable law or is impractical or unfeasible for any legal or regulatory reason; and
- using our service to offer, or otherwise make available to others, fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

#### Analytics for Monitoring Traffic

SimpleFiber uses a third-party vendor for traffic analytics. We use Transnexus ClearIP software to detect calling patterns consistent with illegal robocalls. If such a call is detected, we will identify the party who is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

#### Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, SimpleFiber's engineering department is alerted and follows the defined procedures on investigating such subscribers. Any detected behavior or request for do not originate is looked into immediately by our engineering department to verify legitimacy and block as needed via IP address or account.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and

- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

SimpleFiber follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, SimpleFiber will devote sufficient resources to provide prompt and complete resources to traceback requests. SimpleFiber commits to responding to traceback requests fully within 24 hours.

#### Blocking

SimpleFiber will promptly respond to Do Not Originate requests it receives from ITG. SimpleFiber has mechanisms to block suspicious calls using internal analytics. If SimpleFiber's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, SimpleFiber will take appropriate action, which may include suspending or terminating the subscriber's use of SimpleFiber's network. SimpleFiber will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or ITG; as well as documenting requests and actions taken in response thereto.

#### Plan Updates

This plan, along with industry best practices, will evolve to respond to the dynamic nature of mitigating illegal robocalling. SimpleFiber will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, SimpleFiber will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

### **Certification of David Knapschaefer**

I, David Knapschaefer, CEO of Simple Fiber Communications LLC ("SimpleFiber"), do hereby certify, under penalty of perjury, the following:

- (1) SimpleFiber has fully implemented STIR/SHAKEN in the IP portions of its network.
- (1) SimpleFiber's Business name and primary address are as follows:  
  
Simple Fiber Communications LLC  
2701 Brown Trail  
Suite 308  
Bedford, TX 76021  
888-455-0151
- (2) SimpleFiber does not use any other business names.
- (3) SimpleFiber has previously used the business name Lancress Communication.
- (4) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (5) The following persons/entities own more than 10% of SimpleFiber each: David Knapschaefer, Chris Rowntree, Brent Svor. The following person is SimpleFiber's principal: David Knapschaefer. None of these persons have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) SimpleFiber has no subsidiaries/affiliates.
- (7) SimpleFiber's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (8) SimpleFiber has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) SimpleFiber is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) SimpleFiber's Operating Company Number is 660K.

/s/ David Knapschaefer  
David Knapschaefer

Date: December 22, 2024.