

Robocall Mitigation Plan

Business Information

Ayden Consulting, LLC
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Contact Information

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Overview

In the Commission's 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, outlines "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

Ayden Consulting, LLC ("Ayden") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. Ayden has fully implemented STIR/SHAKEN. In compliance with the R&O, Syndeo submits this RMP and certification.

Know Your Customer

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Ayden in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

New Subscribers

All new subscribers go through sign up process and during an account registration process Ayden confirms an account by vetting a subscriber directly. The vetting process includes collecting information such as:

- physical business location,
- business contact information,
- contact person(s) details,
- state or country of incorporation,
- nature of the customer's business

Existing Subscribers

Ayden require updates of subscribers' information on all their orders. Each order's identity markers are verified again to ensure the account is not compromised and is being used for its intended purpose.

Acceptable Use Policy

Ayden maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Ayden's network. Among other things, this AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Ayden's service to engage in or in connection with fraudulent activities.

Ayden's contractual terms with subscribers specify that Ayden may take action up to suspension or termination of service for violation of the AUP.

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, Ayden provides the following information concerning its upstream voice service carriers:





Ayden has no contractual provisions with its upstream carriers concerning robocall mitigation, but Ayden and its upstream providers work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Ayden and/or obtained by Ayden from one of Ayden's underlying carriers for use by the subscriber. In most cases, Ayden directly manages the TNs used by its subscribers. Ayden tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Ayden's assignment of the TN to its subscriber.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Ayden, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Ayden will attest calls originated with these TNs.

When originating a call, Ayden checks the calling party number against Ayden's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Mitigation Through Contracts

All subscribers agree to participate in traceback requests (this is part of the Terms and Conditions which users must agree to when creating an account with us).

During Service

All subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP originated calls are signed with subscriber caller ID only after number validation; and
- Requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Monitor Traffic with Analytics

Ayden monitors the subscriber's phone logs when we suspect traffic abnormalities. On its network, Ayden strictly prohibit robocalls and clearly communicate this to all users. If suspicious call activity is detected, we swiftly investigate, and terminate the user from our network permanently to prevent unauthorized use. We're committed to maintaining a secure and compliant telecommunications environment.

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

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted which follows the defined procedures on investigating such subscribers.

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 particular use case and validate that the activity belongs to that subscriber.

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

Ayden will investigate suspicious activity reported to Ayden by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Ayden contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

For all new and renegotiated Ayden contracts governing the transport of voice calls, Ayden will use best efforts to contractually require Ayden's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

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

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Ayden will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Ayden 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 Muhammad Saud

I, Muhammad Saud, Director of Ayden Consulting, LLC ("Ayden") do hereby certify, under penalty of perjury, the following:

- a. Ayden has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. Ayden's business name and primary address are as follows:

Ayden Consulting, LLC
16192 Coastal Hwy
Lewes, DE 19958

- c. Ayden has no other business names in use.
- d. Ayden has not previously used any other business name.
- e. 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.
- f. Ayden has one owner: Muhammad Saud who owns 100% of Ayden.
- g. Ayden's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- h. Ayden and its interest holder have not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Ayden and its interest holder have not subject been to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Ayden's Operator Code Number is 220K



Muhammad Saud