

## **Robocall Mitigation Plan**

### Business Information

IFN.com, Inc.  
13005 Artesia Blvd  
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Cerritos CA 90703

### 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" procedures;
- 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

IFN.com, Inc. ("IFN") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. IFN is fully STIR/SHAKEN compliant. In compliance with the R&O, IFN 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 IFN in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

IFN enforces strong contractual compliance upon the subscribers it serves. Subscriber identification of upstream sources of illegal robocalls and willingness to comply with traceback requests will be enforced as part of the terms of service. IFN will require subscribers (including enterprise and

wholesale customers) to identify “upstream” sources of illegal robocalls calls on their networks, and to identify their own customers who originate illegal calls. Failure to comply with these terms of service will result in action against the customer including, but not limited to, penalty fees and account termination. To that end, IFN obtains the following information from each subscriber: (a) company name, (b) contact person information, (c) phone number, and (d) information about their business.

#### Acceptable Use Policy

IFN maintains an Acceptable Use Policy (“AUP”) that subscribers must agree to before being permitted to use its network. A link to the AUP is here: <https://tollfreeforwarding.com/terms-and-conditions/>

#### 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, IFN provides the following information concerning its upstream voice service carrier.

Bandwidth Inc.  
900 Main Campus Drive  
Raleigh NC 27606  
Stephen Thayer  
[voicesecurity@bandwidth.com](mailto:voicesecurity@bandwidth.com)

#### Monitor Traffic with Analytics & Investigating Suspicious Activity

As part of a comprehensive robocall mitigation strategy, IFN utilizes a custom designed suite of tools that dynamically observes, reports, and acts based on patterns of account behavior and call behavior. This dynamic traffic analysis suite uses factors associated with call behavior such as intermittent bursts of high activity, suspiciously low call completion rates, and evidence of systematic calling to highlight suspicious accounts to the TollFreeForwarding.com fraud prevention team.

Depending on the clarity of the fraud markers, the system also regularly takes independent action to protect the telecom network and prevent fraudulent activity. When traffic analysis indicates the presence of likely illegal robocalling, IFN has a process to conduct further investigation. Depending on the type and severity of the event, possible responses can include instituting traceback investigations to identify the source of the calls, verifying suspicious activity with customers, suspending customers who are putting robocalls into the system, and contacting relevant law enforcement agencies. IFN stands ready to cooperate with law enforcement and investigative bodies that initiate traceback requests. The company will respond to lawful requests from state attorneys general office, the Commission, industry traceback groups, and local law enforcement.

No third-party vendors are involved in deploying IFN’s analytics.

#### Blocking

IFN will implement Do Not Originate requests it receives from the ITG. IFN has mechanisms to automatically block suspicious calls using internal analytics. If IFN’s monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, IFN will take

appropriate action which may include suspending or terminating the subscriber's use of IFN's network.

#### Plan Updates

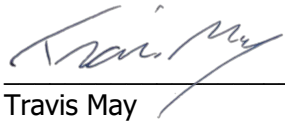
This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. IFN will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, IFN 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 Travis May**

I, Travis May, CEO of IFN.com, Inc. ("IFN") do hereby certify, under penalty of perjury, the following:

- a. IFN is fully STIR/SHAKEN compliant.
- b. IFN's business name and primary address are as follows:  
  
IFN.com, Inc.  
13005 Artesia Blvd  
Suite A-100  
Cerritos CA 90703
- c. IFN has two d/b/a's (1) TollFreeForwarding.com; and (2) Panda Global Communications.
- d. IFN has not previously used any other business name besides the two listed above.
- 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. IFN has one owner: Travis May owns 100% of IFN. IFN has no subsidiaries or affiliates.
- g. IFN role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation.
- h. IFN is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. IFN has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. IFN's OCN is 659J.

  
Travis May

April 25, 2024