

Robocall Mitigation Plan
Maxsip Tel LLC

Other DBA Names: Maxsip Telecom

Maxsip Tel LLC (“Maxsip”) submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)–(iii). This plan is applicable to Maxsip and its affiliate T-Wire. Affiliates Terracom Inc. and Yourtel America, Inc. have adopted their own plans.

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:

By agreeing to Maxsip’s Terms and Conditions, Maxsip customers agree not to intentionally or unintentionally violate any applicable law. Maxsip reserves the right to suspend or terminate a customer’s account if the customer misuses or abuses Maxsip’s services.

Maxsip may block complete or partial traffic from customers based on the feedback received from its terminating carriers. Maxsip partners with Prepaid Wireless Group (“PWG”) to monitor spamming. PWG notifies Maxsip if an end user is making an illegal call, and Maxsip promptly complies with requests to terminate that end user’s line.

Maxsip also requires customers (including enterprise and wholesale customers) to identify “upstream” sources of illegal robocalls on their networks and to identify their own customers who originate illegal calls.

Description of Analytics to Block Illegal Traffic: Maxsip monitors its subscribers for excessive usage utilizing the reports it receives from its underlying Mobile Network Operator (T-Mobile) and PWG.

Know Your Customer Practices:

Because Maxsip is an Affordable Connectivity Program (“ACP”) and Lifeline provider, substantially all of Maxsip’s customers sign up for service using the National Verifier or National Lifeline Accountability Database. That enrollment process collects substantial personal information to verify the identity of Maxsip customers, including name, address, birth date, phone number, email address, and last four digits of their Social Security Number.

Maxsip’s non-ACP and non-Lifeline pre-paid and post-paid customers all provide name, address, phone number, email address, and credit card information.

Know Your Upstream Provider Practices:

Maxsip obtains its voice services, including telephone numbers, directly or indirectly (through an aggregator) from T-Mobile. T-Mobile has filed its own STIR/SHAKEN certification. Maxsip partners with PWG to monitor its traffic for suspected or actual illegal robocalls and promptly terminates such traffic upon notification from PWG.

Commitment to Respond to Traceback Requests:

Maxsip is willing and able to respond fully and within twenty-four hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

This Robocall Mitigation Plan describes the specific measures that Maxsip has implemented as of the date of submission. Maxsip continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.