

Robocall Mitigation Plan

Business Information

VOXO LLC
6184 US 98
Suite 210
Hattiesburg, MS

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;
- "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 an 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

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

Know Your Customer ("KYC")

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 VOXO in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

VOXO's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information as:

- physical business location;
- contact person(s);
- nature of the customer's business.

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

VOXO has one upstream provider from which it receives voice traffic:

Inteliquent, Inc. DBA Onvoy, Sinch ("Inteliquent")
One Alliance Center
3500 Lenox Road NE
Suite #1875
Atlanta, GA 30326
Frank Digrazia
Frank.DiGrazia@sinch.com

VOXO has a master service agreement with its upstream provider and diligently works with it to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Robocall Mitigation Strategies

1. **Monitoring and Reporting:** VOXO maintains vigilant monitoring of outbound voice traffic to detect any signs of illegal robocalling activities. Suspicious calls, including those with invalid or unallocated numbers, are promptly investigated, and appropriate actions are taken in accordance with our mitigation procedures.
2. **Customer Education and Engagement:** We prioritize customer education and engagement to prevent the misuse of our services for illegal robocalling purposes. Our customers are provided with resources and guidelines on ethical usage practices, and we encourage open communication channels for reporting any suspicious activities or concerns.
3. **Collaboration with Regulatory Entities:** VOXO remains committed to collaborating with regulatory bodies, law enforcement agencies, and industry stakeholders in combating illegal robocalls. We promptly respond to trace back requests and cooperate with investigations to identify and halt any illegal robocallers operating on our network.

Acceptable Use Policy ("AUP")

VOXO maintains an AUP that subscribers must sign before being permitted to use VOXO's network. Among other things, the AUP prohibits the use of VOXO's services for telemarketing, broadcast faxing, delivery of unauthorized or unsolicited advertising, promotional materials or solicitations. Failure to abide by VOXO's terms or violation of any state or federal laws or laws of any other competent jurisdiction may result in immediate account termination and/or disconnection of the offending service. VOXO reserves the right to terminate service at any time with or without notice; especially if Customer is found to be in violation of VOXO's Terms & Conditions.

Analytics for Monitoring Traffic

VOXO works with its upstream provider to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored include:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, VOXO works with its upstream provider to follow 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.

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

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

VOXO works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to VOXO by subscribers or third parties. The investigation could potentially result in opening a traceback request or with VOXO contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

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

Blocking

VOXO will implement Do Not Originate requests it receives from ITG. VOXO's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If VOXO and/or its

upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, VOXO will take appropriate action which may include suspending or terminating the subscriber's use of VOXO VOXO's service. VOXO 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), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. VOXO 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, VOXO 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 Josh Reed

I, Josh Reed, CEO of VOXO, do hereby certify, under penalty of perjury, the following:

- (1) VOXO has fully implemented STIR/SHAKEN in the IP portions of its network.
- (1) VOXO's Business name and primary address are as follows:

VOXO LLC
6184 US 98
Suite 210
Hattiesburg, MS
- (2) VOXO has no other business names in use.
- (3) VOXO has not previously used any other business name.
- (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) VOXO has the following principals: Joe Mordica, Phil Watson, and Josh Reed. These individuals have never had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) VOXO has no subsidiaries or affiliates.
- (7) VOXO's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (8) VOXO has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) VOXO is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) VOXO's Operating Company Number is 313M.



Josh Reed