



STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, **Lightspeed Networks, Inc. dba LS Networks** submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures **Lightspeed Networks, Inc. dba LS Networks** has in place to mitigate illegal robocalls as of **April 23rd, 2024**. **Lightspeed Networks, Inc. dba LS Networks** may modify, add, delete, or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Lightspeed Networks Inc. dba LS Networks has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed from the Database by the Commission.

Lightspeed Networks, Inc. dba LS Networks has not been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

STIR/SHAKEN Implementation

Lightspeed Networks, Inc. dba LS Networks is currently unable to comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as Lightspeed Networks, Inc. dba LS Networks does not have an OCN as an OCN is a prerequisite to obtaining a Service Provider Code (SPC) token. Second Caller ID Authentication Report and Order, 36 FCC Rcd at 1868, para. 19 (citing First Caller ID Authentication Report and Order, 35 FCC Rcd at 3260, para. 40); id. at 1882-83, para. 50; 47 CFR § 64.6304. However, Lightspeed Networks, Inc. dba LS Networks does comply fully with all other Commission rules and policies more generally.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.



Risk Assessment. **Lightspeed Networks, Inc. dba LS Networks** is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Lightspeed Networks, Inc. dba LS Networks has not received information suggesting that robocalls are originated on its network. Therefore, **Lightspeed Networks, Inc. dba LS Networks** does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: **Lightspeed Networks, Inc. dba LS Networks** conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, is incorporation documents. The Company confirms the customer's service address for all customers.

- **Lightspeed Networks, Inc. dba LS Networks** verifies customer's credit history and business reputation prior to providing service.
- **Lightspeed Networks, Inc. dba LS Networks** verifies customer information when contracts are renewed, or services are added.
- **Lightspeed Networks, Inc. dba LS Networks** verifies the customer's identity and their right to use the telephone number presented on calls.
- **Lightspeed Networks, Inc. dba LS Networks** has the policies that define the circumstances by which it will deny, suspend, or terminate service to a customer.

Direct IP Intermediate Carrier Due Diligence: **Lightspeed Networks, Inc. dba LS Networks** is not a Direct Intermediate Carrier and only provides commercial voice services to its customers.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- **Lightspeed Networks, Inc. dba LS Networks** has in place an enforceable term of use and/or an acceptable use policy. **Lightspeed Networks, Inc. dba LS Networks** also has in place policies designed to detect and prevent fraudulent traffic on its network.
- **Lightspeed Networks, Inc. dba LS Networks** uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If **Lightspeed Networks, Inc. dba LS Networks** has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, **Lightspeed Networks, Inc. dba LS Networks** can suspend and/or terminate service to the customer.



- **Lightspeed Networks, Inc. dba LS Networks** verifies that the direct intermediate carriers that are used by **Lightspeed Networks, Inc. dba LS Networks** are in the FCC RMD and does not accept traffic from intermediate carriers who are not in the RMD.
- **Lightspeed Networks, Inc. dba LS Networks** blocks the following types of calls by default:
 - ☒ Calls originating from invalid numbers per FCC Order **[2017 Call Blocking Order]**
 - ☒ Calls from DNO numbers as per FCC Order **[2017 Call Blocking Order]**
- **Lightspeed Networks, Inc. dba LS Networks** also blocks the following types of calls:
 - ✓ Calls that use a Caller ID that does not belong to Lightspeed Networks, Inc. dba LS Networks customer that is originating the call (network-based blocking rules). Exceptions are made for call forwarding, only if the Lightspeed Networks, Inc. dba LS Networks customer that is originating the call includes a P-Asserted-Identity that the call originator owns.
 - ✓ As an originating service provider and/or intermediate carrier that is immediately downstream from a bad actor, will block traffic from the bad actors when notified by the commission.

Responding to Traceback Requests

- **Lightspeed Networks, Inc. dba LS Networks** has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- **Lightspeed Networks, Inc. dba LS Networks** will respond within 24 hours of receipt of traceback request to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, **Lightspeed Networks, Inc. dba LS Networks** will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.



Cooperation with State and Federal Regulators

Lightspeed Networks, Inc. dba LS Networks will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, **Lightspeed Networks, Inc. dba LS Networks** will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Fully implement mandated robocall mitigation procedures possible with the goal of maximizing the mitigation of illegal robocalls.

Lightspeed Networks, Inc. dba LS Networks has deployed call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls.

Lightspeed Networks, Inc. dba LS Networks is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Randall Brogle', written in a cursive style.

Randall Brogle
Chief Executive Officer
Lightspeed Networks, Inc. dba LS Networks