

Robocall Mitigation Plan
Google Voice Inc.

Other DBA Names:

Google Voice, Google, Google Fi, Google Fiber, and Fiber Phone

Google Voice Inc., on behalf of itself and its affiliates, ("Google") submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii).

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

In addition to fully implementing STIR/SHAKEN pursuant to 47 CFR § 64.6301, Google has contractual terms with its users that are intended to both prevent new and existing users from originating unlawful calls on its network and also protect users from receiving them. Separate terms of service apply to consumer Google Voice, Google Voice for Business, and Google Fi.

For example, the consumer Google Voice Acceptable Use Policy prohibits users from placing calls in violation of marketing laws or with the intent to harass, threaten, bully, or impersonate; the Google Fi Acceptable Use Policy prohibits users from generating or facilitating unsolicited or automated calls or to use the service for any unlawful or fraudulent purpose; and the applicable policy for Google Voice for Business prohibits users from using the service to violate the rights of others. Violation of these terms is grounds for suspension or termination.

Google may suspend or terminate users for violating its terms prohibiting unlawful calls, which is an affirmative measure that Google may take to keep unlawful calls off of its network and to keep users safe.

Know Your Customer Practices:

To sign up for Google Voice for Business, entity administrators must first sign up and pay for a Google Workspace account. To sign up for a Google Workspace account, customers must provide their business name, business size, business location details (country, street address), current business email address and phone number, and up-to-date billing information.

To sign up for consumer Google Voice, users must provide a currently operational phone number that is then linked to their Google Voice account. The phone number must be from a vetted carrier with a certificate in the Robocall Mitigation Database. In addition, Google conducts reputation checks on each prospective consumer Google Voice user to ensure the user has not previously violated Google's acceptable use policies.

To sign up for Google Fi, users must provide their home address and a valid form of payment. At sign up, Google will add an authorization hold to the user's account to ensure the payment method is active and valid. Customers that choose to finance a device through Google Fi must undergo a credit check.

Other Practices to Prevent Unlawful Calls:

For Google Voice for Business, consumer Google Voice, and Google Fi, automated anti-abuse rules are in place to track calling patterns that indicate unlawful activity, such as automated

calling. Call recipients can also report whether they have received unlawful calls. This data is tracked and used to suspend customers for violation of the law or Google's Acceptable Use Policy or Terms of Service.

Google Voice for Business and consumer Google Voice customers are also prohibited from making calls to certain international destinations beyond what is allowed by contract. Google Voice for Business customers are limited as to how many telephone numbers they can purchase for each license, which prevents potential bad actors from making use of additional telephone numbers to conduct unlawful calling activity.

Know Your Upstream Provider Practices:

Google has a contractual business relationship with each upstream provider with which it interconnects. Google goes beyond conducting due diligence to ascertain the provider's identity by requiring the provider to agree to appoint a qualified employee to hold regular business review sessions with Google. During the business review sessions, the provider is required to review feedback and share ideas for service improvements. Any issues regarding suspected unlawful traffic would be reviewed in these sessions. In addition, Google requires its providers to undergo annual security reviews and penetration testing to identify vulnerabilities in providers' systems that could be exploited by bad actors.

Description of Analytics to Block Illegal Traffic:

As noted above, Google has its own analytics systems for tracking calling patterns that can identify illegal calls. Google does not use any third parties to provide such analysis.

Commitment to Respond to Traceback Requests:

Google is committed and has the necessary procedures in place to respond fully and within 24 hours to all traceback requests from the 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 Google Voice has implemented as of the date of this submission. Google continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.