



123.Net, Inc.
24700 Northwestern Hwy
Suite 700
Southfield MI 48075

Federal Communications Commission

Re: Certification and Submission of Robocall Mitigation Plan

Dear FCC Robocall Mitigation Database Administrator,

I am writing on behalf of 123.Net, Inc., a voice service provider, to certify and submit the required information as per the FCC's Robocall Mitigation Certification Requirements. We acknowledge the necessity to combat illegal robocalls and assure compliance with the guidelines set forth by the FCC.

****Certification****

I, James Kandler, COO at 123.Net, Inc., hereby certify that all calls originating on our network are subject to a comprehensive robocall mitigation plan. This plan includes detailed practices that can be reasonably expected to significantly reduce the carrying, processing, or originating of illegal robocalls. Included in this filing is our Robocall Mitigation Plan, outlining the specific reasonable steps 123.Net, Inc. has taken to mitigate illegal robocalls.

****Roles of 123.Net, Inc. in the call chain****

123.Net, Inc. is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users in addition to a non-gateway intermediate provider with a STIR/SHAKEN obligation.

****STIR/SHAKEN Implementation Extensions / Exemptions****

123.Net, Inc. has qualified for two implementation extensions / exemptions under its STIR/SHAKEN obligations, specifically 1) being a small voice provider, as defined as having under 100,000 lines, and 2) the lack of technical ability in network infrastructure to implement STIR/SHAKEN on existing TDM infrastructure.

However, 123.Net, Inc. has implemented the STIR/SHAKEN authentication framework on the SIP portion of its network and calls it originates on that portion of its network are compliant with §64.6301(a)(1) and (2), and the remainder of the calls that originate on its older TDM network are and have been subject to a robocall mitigation program.

****Information on Owner, Affiliates, Subsidiaries, and Parent Company:****

OCN: 2550

Address / Parent Company:

123.Net, Inc
24700 Northwestern Hwy
Suite 700
Southfield MI 48075

****Investigations Status:****

123.Net, Inc. is not subject to any investigation for suspected unlawful robocall or spoofing activity (such as the FCC or other law enforcement or regulatory agencies)

****Robocall Mitigation Plan****

123.Net, Inc. has taken reasonable steps to ensure that robocall sources do not originate from its network, and if sources are detected, steps are taken swiftly to terminate the calling source. With a multi-pronged approach, the following areas are covered:

- Meeting Existing Obligations
- KYC / KYUP Procedures
- Call Analytics

****Meeting Existing Obligations:****

In accordance with our existing obligations, our terms and conditions explicitly outline provisions related to the use of our services to mitigate the risk of illegal robocalls. We prohibit the use of VoIP Service for auto-dialing, telemarketing, call center activities, continuous use of extensive call forwarding, call relaying, fax broadcasting, or fax blasting. Additionally, if we determine, at our sole discretion, that a customer is engaging in any of these prohibited activities, we reserve the right to immediately terminate the Agreement or modify the VoIP Service and pricing.

Additionally, we impose limitations on unlimited calling plans which explicitly prohibits telemarketing, using auto-dialer equipment, fax blasting, operating a call center, internet dialing, using party lines, reselling the Service, sharing the Service without express written approval, or any other abuse of the Service. If we believe, at our sole discretion, that a customer is in violation of these limitations, we reserve the right to increase monthly fees for unlimited rate plans and/or immediately terminate the Service.

These provisions underscore our commitment to preventing the origination of illegal calls and ensuring that our services are used responsibly and in compliance with regulatory requirements.

****Know-Your-Customer / Know-Your-Upstream Provider Procedures:****

123.Net, Inc. sells voice services to commercial customers. Those customers are required to provide identifying information on the customer order paperwork, including company name, address, contact information, and signature of authorized party. This information is validated via our sales team via in-person visits or via online research prior to provisioning of services.

When porting numbers, customers provide additional documentation from their current service provider along with a Letter of Agency to identify the numbers being ported.

In addition, 123.Net, Inc. does not sell services to international call originators. The sales team is trained to not sell to automatic dialing sources and similar robocall originators.

****Call Analytics Systems:****

123.Net, Inc. utilizes TransNexus along with its own internal queries of call detail record metadata to analyze calling patterns across the network and flags any that are likely to be robocalls. Typical measurements which flag suspicious activity include short call duration, incorrect caller ID data such as calls on the Do Not Originate list, and other sources which may flag a call with a poor reputation. Once call activity has been flagged, the 123.Net, Inc. Network Operations Center will investigate the source of the calls and determine whether to warn a customer to stop the offending calling behavior or terminate service as appropriate.

123.Net, Inc. is committed to respond within 24 hours to any traceback request from the industry and will cooperate with industry contacts to investigate and stop any illegal robocalling activity. The points of contact for traceback requests are:

Robocall Mitigation Contacts:

Primary: traceback@123.net

Name: James Kandler

Phone: 248-724-2201

Secondary: support@123.net

Name: Network Operations Center

Phone: 888-440-0123

We are committed to cooperating fully with the FCC in its efforts to curb the menace of illegal robocalls. Should you require any further information or clarification, please do not hesitate to contact us.

Thank you for your attention to this matter.

Sincerely,

James Kandler

COO

248-724-2201

jkk@123.net