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Federal Communications Commission
Washington, D.C. 20554

Robocall Mitigation Plan for Fibernetics Corporation

1. Fibernetics Corporation (“Fibernetics”) is pleased to submit the following Robocall Mitigation Plan (“RMP”) to the Federal Communications Commission (“FCC”) in relation to Fibernetics registration in the FCC’s Robocall Mitigation Database (“RMD”).
2. Fibernetics is a Canadian telecommunications provider subject to the Canadian Telecommunications Act (S.C. 1993, c. 38) (“Telecom Act”) and to the regulatory authority of the Canadian Radio-television and Telecommunications Commission (“CRTC”). For the purpose of its registration in the RMD, Fibernetics is a foreign voice service provider.
3. Fibernetics originates and terminates calls within Canada, and uses international transit partners to terminate calls destined to the United States or other countries.
4. Fibernetics has a commitment to keeping our networks secure and protecting our customers from unlawful activities such as frauds, scams, cyber threats, and nuisance calling.
5. Fibernetics has implemented several robocall mitigation measures to significantly reduce the origination of illegal robocalls. Fibernetics commits to take reasonable steps to avoid originating illegal robocall traffic; to respond in a timely manner to all traceback requests; and to fully cooperate with other entities in investigating and stopping any illegal robocall origination. Following is further detail on said measures Fibernetics has implemented to reduce illegal robocalls:
 - a. Pursuant Compliance and Enforcement and Telecom Regulatory Policy CRTC 2018-484 *Implementation of universal network-level blocking of calls with*

blatantly illegitimate caller identification, Fibernetics has implemented universal network-level call blocking where the caller identification purports to originate from telephone numbers that do not conform to established numbering plans.

- b. Fibernetics was an active participant in the first Canadian call traceback trial conducted in 2020, the results of which were reported (NTRE0067) by the CRTC Interconnection Steering Committee (“CISC”) Network Working Group (“NTWG”) to the CRTC. Subsequently, the CRTC issued Compliance and Enforcement and Telecom Decision CRTC 2021-268 *CISC Network Working Group Consensus Report – Canadian traceback trial report*, on 5 August 2021, and since then Fibernetics has actioned all traceback requests received. Fibernetics will continue to respond fully and in a timely manner to all traceback requests received from the CRTC, the FCC, law enforcement, or the industry traceback consortium.
- c. Fibernetics has evaluated STIR/SHAKEN standards and solutions for Canada to authenticate and verify caller identification information for Internet Protocol (“IP”) based voice calls pursuant Compliance and Enforcement and Telecom Decision CRTC 2021-123 *STIR/SHAKEN implementation for Internet Protocol-based voice calls*. Fibernetics does have partial STIR/SHAKEN implemented and has analytics running on all calls originating on our network to look for patterns that may indicate illegal robocalls and either flag the calls or possibly block them.
- d. Fibernetics is an active member of the Canadian Secure Token Governance Authority (CST-GA). The CST-GA develops policies and supports industry protocols and procedures, designed to authenticate voice calls and mitigate spoofing and illegal robocalling (i.e. STIR/SHAKEN).
- e. Fibernetics is a participant in the CRTC Interconnection Steering Committee working group activities related to STIR/SHAKEN, nuisance calling, and traceback activities. Fibernetics complies with all related regulatory obligations.

- f. If the FCC authorizes voice service providers to block all traffic from a voice service provider, and if Fibernetics carries such traffic, then Fibernetics will consider our ability to stop carrying the offending traffic, within the bounds of Canadian regulatory requirements, U.S. regulatory requirements, and our contractual obligations. To the extent permitted by such requirements and obligations, such steps may include terminating our relationship with that voice service provider.
 - g. Fibernetics knows its customers by conducting due diligence on both new and renewing customers. All customers are vetted and bound by policies and contractual terms to, amongst other things, not originate illegitimate robocalls on Fibernetics network. Contracts specifically prohibit the use of any service in an illegal, non-compliant, or abusive manner. Customers are held accountable for the quality of traffic they are routing to our network. In addition, wholesale customers are required to register with the CRTC as a Carrier or Reseller. Fibernetics actively monitors its voice network to investigate and action any possible illegal robocalls.
 - h. Fibernetics periodically evaluates the risks it faces, the effectiveness of its policies and procedures, and its capabilities to detect and prevent illegal robocalls on its network.
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- 6. Beyond technical solutions, Fibernetics communicates regularly with its staff and working partners to assist in recognizing and protecting consumers and networks from illicit and fraudulent calls. We continually work with other telecommunications service providers and regulatory authorities to assist and provide protection from all types of nuisance calls.
 - 7. Fibernetics is committed to cooperating with the FCC and the telecommunications industry in investigating and stopping robocalls.

Respectfully submitted,

Fibernetics Corporation

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