

Robocall Mitigation Plan

Business Information

Royell Communications
126 N. Hobson St.
Virden, IL 62690

Contact Information

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Overview

In the Commission's 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, outlines "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;
- 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 a 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

Royell Communications ("Royell") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. Royell is fully STIR/SHAKEN compliant. In compliance with the R&O, Royell submits this RMP and certification.

Know Your Customer

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated that subscriber. A subscriber is an entity that has a business relationship with Royell in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Royell's KYC program requires a signed contract with our subscribers. Prior to signing a contract, Royell confirms a subscriber's identity by vetting a subscriber directly or through a third-party vetting service. The vetting process includes collecting such information such as:

- physical business location;

- contact person(s);
- Telephone numbers;
- state or county of incorporation;
- federal tax ID; and
- nature of the customer's business.

Acceptable Use Policy ("AUP")

Royell's AUP is found here: [://royell.net/docs/Royell_VoIP_terms_of_service.pdf](http://royell.net/docs/Royell_VoIP_terms_of_service.pdf)

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, Royell provides the following information concerning its upstream voice carrier:

VoIP Innovations
445 Jan Davis Highway, NW
Huntsville, AL 35806
Tom Cavey
tcavey@sangoma.com

This upstream provider abides by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Royell. Royell and its upstream provider work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Royell and/or obtained by Royell from Royell's underlying carrier for use by the subscriber. In most cases, Royell directly manages the TNs used by its subscribers. Royell tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Royell's assignment of the TN to its subscriber.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Royell, then TN validation is necessary. Subscribers are required to either submit documentary evidence and/or complete a proprietary verification process prior to being given the ability to use a TN not directly managed by Royell on outbound PSTN calls. On outbound PSTN calls, Royell's network only allows customers to use either a TN that Royell's has assigned to the customer (on-network) or verified numbers; and will only attest to calls placed from on-network or verified numbers (unchecked spoofing is not allowed nor supported).

Monitor Traffic with Analytics

Royell monitors metrics including (but not limited to) concurrent calls, answer seizure ratio, average call duration, per subscriber minute totals, per subscriber usage costs, failure types from SBC endpoints, etc. Alerts are triggered when behavior that is consistent with illegal robocalling is detected.

Royell's traffic analysis identifies behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiated calls (synchronous intervals, quick dialing back-to-back calls);
- recent volumes vs recent 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).

No third parties are involved with deploying Royell's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted, which follows the defined procedures on investigating such subscribers.

The procedures established may 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;
- blocking any further outbound calls to the PSTN; and
- contacting the subscriber to understand their particular use case and validate that the activity belongs to that subscriber.

Royell actively participates in Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Royell devotes sufficient resources to provide prompt and complete resources to traceback requests. Royell will respond to traceback requests within 24 hours of receiving same.

Blocking

Royell will implement Do Not Originate requests it receives from the ITG. If Royell's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Royell will take appropriate action which may include suspending or terminating the subscriber's use of Royell's network. Royell will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, the state attorney general's office, etc.), to the FCC and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Royell will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Royell 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 Nicolas Eastman

I, Nicolas Eastman, Infrastructure Manager of Royell Communications ("Royell") do hereby certify, under penalty of perjury, the following:

- a. Royell has fully implemented STIR/SHAKEN in the IP portions of its network. Royell directly signs all its calls.
- b. Royell's business name and primary address are as follows:

Royell Communications
126 N. Hobson St.
Virden, IL 62690

- c. The following persons own 10% or more of Royell: Joseph Royer & Theresa Snell.
- d. The above-listed individuals are Royell's sole principals. Royell has no affiliates or subsidiaries.
- e. None of the persons/entities listed above have had licenses revoked by the FCC or have been subject to FCC enforcement actions.
- f. Royell does not have any other business name.
- g. Royell's has not previously used any other business name.
- h. 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.
- i. Royell's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation to serve end-users.
- j. Royell has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- k. Royell is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- l. Royell's Operator Code Number is 411K.


Nicholas Eastman