

Robocall Mitigation Plan

Business Information

IEvolve, Inc.
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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;
- "know your upstream provider" procedures;
- ownership information;
- 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

IEvolve, Inc. ("IEvolve") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. IEvolve is fully STIR/SHAKEN compliant. In compliance with the R&O, IEvolve submits this RMP and certification.

Know Your Customer ("KYC")

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

IEvolve's KYC program involves obtaining specific subscriber information before providing service. This process includes a customer vetting process in which such information as physical business location, contact person(s), state or country of incorporation, federal tax ID and nature of the customer's business is collected by IEvolve.

Acceptable Use Policy ("AUP")

IEvolve maintains an AUP that subscribers must agree to before being permitted to use IEvolve's network. The AUP prohibits is here: <https://www.i-evolve.com/legal/acceptable-use-policy>

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, IEvolve provides the following information concerning its upstream voice service carriers:

Bandwidth, Inc.
2230 Bandmate Way
Raleigh, NC 27607
Andrew Baker
ambaker@bandwidth.com

Telnyx, LLC
311 West Superior St
Suite 504
Chicago IL 60654
Kirk Sweeney
kirk@telnyx.com

CenturyLink Communications, LLC
100 CenturyLink Dr. Mailstop: 3TCW088.2
Monroe LA 71203
Philip Linse
philip.linse@lumen.com

IEvolve's service agreements with its upstream providers contain no language concerning robocall mitigation. But IEvolve and its upstream providers have agreed to work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests. IEvolve's upstream providers are listed as STIR/SHAKEN compliant in the Robocall Mitigation Database.

Monitoring With Analytics

IEvolve works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If IEvolve detects a calling pattern consistent with illegal robocalls, we will identify the party and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our system.

No third-party vendors are involved in deploying IEvolve's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, IEvolve follows certain procedures on investigating such subscribers. The procedures established 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 strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

IEvolve follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, IEvolve will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

IEvolve will implement Do Not Originate requests it receives from the ITG. IEvolve works with its upstream carrier to block suspicious calls. If IEvolve and/or its upstream carrier identify suspected robocalling patterns that are confirmed with further investigation, IEvolve will take appropriate action which may include suspending or terminating the subscriber's use of IEvolve's network. IEvolve will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), and the FCC, 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. IEvolve 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, IEvolve 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 David Meller

I, David Meller, CEO of IEvolve, Inc. ("IEvolve") do hereby certify, under penalty of perjury, the following:

- a. IEvolve is fully STIR/SHAKEN compliant
- b. IEvolve's business name and primary address are as follows:

IEvolve, Inc.
501 John James Audubon Pkwy
Suite 201
Amherst, NY 14228

- c. IEvolve has no d/b/a.
- d. IEvolve has not previously used any other business names.
- e. 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.
- f. The entities/individuals with 10% or more ownership in the company are:
 - i. David Meller
 - ii. Paula Meller
- g. IEvolve's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation.
- h. IEvolve is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. IEvolve has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. IEvolve's Operator Code Number is 857J.



David Meller