

Robocall Mitigation Plan

Business Information

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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 (adopted March 16, 2023) it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps, the FCC requires that a RMP includes:

- "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

CTCTX, LLC ("CTCTX") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. CTCTX is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. Because CTCTX does not have access to the necessary infrastructure, it is not required to be STIR/SHAKEN compliant. CTCTX works closely with its upstream providers to carry out the required mitigation functions.

Know Your Customer

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 CTCTX in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

CTCTX's KYC program involves setting up and managing each customer's phone system. CTCTX is involved in making changes and supporting the systems monthly. Additionally, CTCTX obtains specific subscriber information before allowing a potential subscriber to use our services. This process includes collecting such information as: (1) business location; (2) contact person(s); (3)

nature of the entity's business; and (4) credit card information. CTCTX does not work with call centers, auto dialers, or any customers that might be involved in robocalling.

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, CTCTX provides the following information concerning its upstream voice service carrier:

Sangoma (formerly VOIP Innovations)
301 N. Cattlemen Road
Suite 300
Sarasota, FL 34232
Compliance
legal@sangoma.com

CTCTX has a master service agreement with its upstream provider and has received assurances from their officials that it has, and will continue to, sign calls transmitted to CTCTX and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to CTCTX. CTCTX and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Telephone Number Analytics

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 CTCTX and/or obtained by CTCTX from CTCTX's underlying carrier for use by the subscriber. In most cases, CTCTX directly manages the TNs used by its subscribers. CTCTX tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of CTCTX's assignment of the TN to its subscriber.

Analytics for Monitoring Traffic

CTCTX works with its upstream providers to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- Anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly 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).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, CTCTX works with its upstream provider to follow defined procedures on investigating such subscribers. Sangoma sends CTCTX notification alerts, and CTCTX also reviews phone systems with random audits and call log reporting. Other procedures include:

- 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; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Sangoma is the only third-party vendor which assists in deploying CTCTX's analytics.

CTCTX follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback investigations. To allow for timely and comprehensive responses, CTCTX will devote sufficient resources to provide prompt and complete resources to traceback requests. CTCTX certifies that it will respond to all traceback requests within 24 hours of receiving same.

CTCTX works with its upstream provider to investigate suspicious activity found by the carrier's monitoring system or reported to CTCTX by subscribers or third parties. An investigation could potentially result in opening a traceback request or with CTCTX contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider(s) to block their use of the platform.

Blocking

CTCTX will implement Do Not Originate requests it receives from the ITG. CTCTX works with its upstream provider to automatically block suspicious calls using analytics. If those analytics reveal suspected robocalling patterns that are confirmed with further investigation, CTCTX will take appropriate action which may include suspending or terminating the subscriber's use of CTCTX's network. CTCTX will cooperate with Investigative Bodies to address traceback requests from law enforcement (including the state attorney general's office), as well as 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 response to the dynamic nature of mitigating illegal robocalling. CTCTX 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, CTCTX 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 Brandon Bulls

I, Brandon Bulls, President of CTCTX, LLC ("CTCTX"), do hereby certify, under penalty of perjury, the following:

- (1) CTCTX, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) CTCTX's business name and primary address are as follows:

CTCTX, LLC
604 S Lake Dallas Drive
Suite A
Lake Dallas, TX 75065
- (3) CTCTX's d/b/a is Corporate Technology Consultants.
- (4) CTCTX has not previously used any other d/b/a names.
- (5) The following person is CTCTX's principal and owns more than 10% of CTCTX: Brandon Bulls, President.
- (6) CTCTX has no subsidiaries or affiliates.
- (7) Neither CTCTX nor any of the persons listed herein have been subject to an FCC enforcement proceeding or have been forbidden to file in the Robocall Mitigation Database.
- (8) 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.
- (9) CTCTX's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (10) CTCTX is not required to, and does not have, an operator company number.

Brandon Bulls