

Robocall Mitigation Plan

Business Information

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Overview

In the Commission's recent 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, outline "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";
- 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

FTS Broadband is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. FTS Broadband has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, FTS Broadband was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers now file RMPs. This document delineates FTS Broadband's RMP. Because FTS Broadband does not have access to the necessary infrastructure, it relies on its upstream carriers to assist in robocall mitigation. As delineated herein, FTS Broadband works closely with its upstream providers to carry out the required mitigation functions.

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

FTS Broadband only has end users; all customer DIDs are from its upstream provider's ELS service. FTS Broadband sets up every customer's phone system and outbound callerID.

FTS Broadband's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

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, FTS Broadband provides the following information concerning its upstream voice service carrier.

FTS Broadband has two upstream providers from which it receives voice traffic:

1. Lumen Technologies, Inc.
100 CenturyLink Dr.
Mailstop: 3TCW88.2
Monroe LA 71203
660 N Capitol Street NW Suite 240
Washington DC 20001
DC
Philip Linse
philip.linse@lumen.com
3037073844
2. Inteliquent, Inc. DBA Vitelity Communication
550 W. Adams St.
Suite 900
Chicago IL 60661
Stacy Graham
Director, Assurance & Trust Services
stacy.graham@sinch.com
Tel.: 217-862-1953

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

Acceptable Use Policy ("AUP")

FTS Broadband maintains an AUP that subscribers must sign before being permitted to use FTS Broadband's network. Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using FTS Broadband's service to engage in or in connection with fraudulent activities.

FTS Broadband's contractual terms with subscribers specify that FTS Broadband may take action up to suspension or termination of service for violation of the AUP.

Mitigation During Service

FTS Broadband works with its upstream providers to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

FTS Broadband 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 initiated 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, FTS Broadband works with its upstream providers to follow defined 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 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.

FTS Broadband works with its upstream providers for traffic analytics.

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

FTS Broadband works with its upstream providers to investigate suspicious activity found by the carrier's monitoring systems or reported to FTS Broadband by subscribers or third parties. The investigation could potentially result in opening a traceback request or with FTS Broadband 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 to block their use of the platform.

For all new and renegotiated FTS Broadband contracts governing the transport of voice calls, FTS Broadband will endeavor to contractually require FTS Broadband's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

FTS Broadband will implement Do Not Originate requests it receives from the ITG. FTS Broadband's upstream providers have mechanisms to automatically block suspicious calls using internal analytics.

If FTS Broadband and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, FTS Broadband will take appropriate action which may include suspending or terminating the subscriber's use of FTS Broadband FTS Broadband's service. FTS Broadband will cooperate with Investigative Bodies (provide a single point of contact 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. FTS Broadband 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, FTS Broadband 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 Franklin Zhang

I, Franklin Zhang, CEO of Franklin Technology Systems, Inc. d/b/a FTS Broadband ("FTS Broadband"), do hereby certify, under penalty of perjury, the following:

- (1) FTS Broadband 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) FTS Broadband 's Business name and primary address are as follows:

Franklin Technology Systems, Inc.
350 Crenshaw Blvd, Suite A201, Torrance, CA 90503
- (3) Franklin Technology Systems, Inc. does business as FTS Broadband.
- (4) FTS Broadband has not previously used any other business name.
- (5) Franklin Zhang is FTS Broadband's owner and director. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) 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.
- (7) FTS Broadband's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) FTS Broadband has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) FTS Broadband is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) FTS Broadband does not, and is not required to have, an operator company number.



Franklin Zhang