

## **Robocall Mitigation Plan**

### Business Information

Yardi Kube, Inc.  
430 South Fairview Avenue  
Santa Barbara, CA 93117

### Contact 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;
- 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

Yardi Kube, Inc. ("Yardi") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates Yardi's RMP.

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

Clients must submit the following information during the KYC process:

- Business Type,
- Full Legal Entity Name,
- Year Company Formed,
- Number of Employees,
- Tax ID /EIN,
- NAICS Code,
- Physical Operating Address,

- Telephone Number,
- Website,
- Name,
- SSN, and
- Birthday of Beneficial Owner.

#### 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, Yardi provides the following information concerning its upstream voice service carrier.

Yardi has one upstream provider from which it receives voice traffic:

Bandwidth Inc  
 900 Main Campus Drive  
 Suite 100  
 Raleigh NC 27606  
 Stephen Thayer  
[voicsecurity@bandwidth.com](mailto:voicsecurity@bandwidth.com)

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

#### Acceptable Use Policy ("AUP")

Yardi maintains an [AUP](#) that subscribers must sign before being permitted to use Yardi'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 law; and
- using Yardi's service to engage in or in connection with fraudulent activities.

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

#### Monitoring

Yardi works to detect a calling pattern consistent with illegal robocalls. If such a call is detected we will identify the party that is using our network to originate those calls 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 network.

### 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 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 or her particular use case and validate that the activity belongs to that subscriber.

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

### Blocking

Yardi will implement Do Not Originate requests it receives from the ITG. Yardi has mechanisms to block suspicious calls using internal analytics, Cisco call blocking/fraud detection, and Bandwidth blocked call list/fraud prevention. If Yardi's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Yardi will take appropriate action which may include suspending or terminating the subscriber's use of Yardi's network. Yardi 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) to the FCC and/or the ITG); as well as documenting requests and 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. Yardi 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, Yardi 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 Gage Greeny**

I, Gage Greeny, Senior Telecommunication Engineer of Yardi, do hereby certify, under penalty of perjury, the following:

- (1) Yardi has fully implemented STIR/SHAKEN in the IP portions of its network.
- (1) Yardi's Business name and primary address are as follows:  
  
Yardi Kube, Inc.  
430 South Fairview Avenue  
Santa Barbara, CA 93117
- (2) Yardi has no other business names in use.
- (3) Yardi has not previously used any other business name.
- (4) 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.
- (5) The following entity is Yardi's owner and parent company: Yardi Systems, Inc. It has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) Yardi's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (7) Yardi has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (8) Yardi is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (9) Yardi's Operating Company Number is 271K.

*Gage Greeny*

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Gage Greeny