

Robocall Mitigation Plan Questionnaire

1. Is your Company a voice service provider (including a foreign voice service provider), as defined in [§64.6300\(1\)](#), and/or an intermediate provider as defined in [§64.1600\(i\)](#) of the FCC rules? (The type of provider is determined on a call-by-call basis, so your company could be both a voice service provider and an intermediate provider.)

Yes ☒ No ☐

If no, skip remaining questions; the Company is not required to implement STIR/SHAKEN, no Robocall Mitigation Plan is required, and the Company does not need to register in the FCC's Robocall Mitigation Database ("RMD").

If yes, and the Company is an intermediate provider only, it must fully implement STIR/SHAKEN in its IP network. As long as the Company is registered in the FCC's Intermediate Provider Registry, it will be automatically registered in the Robocall Mitigation Database and is not required to enter any additional information in the database.

2. Does the Company lack control of the network infrastructure necessary to implement STIR/SHAKEN (e.g., the Company operates as a pure reseller without any switching facilities)?

Yes ☐ No ☒

*If yes, the Company is not required to implement STIR/SHAKEN, but by June 30, 2021 it must register in the FCC's Robocall Mitigation Database and submit a Robocall Mitigation Plan. Skip to **Robocall Mitigation Plan Development**.*

3. Has the Company fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with [§64.6301\(a\)\(1\) and \(2\)](#)?

Yes ☒ No ☐

If yes, and the Company does not have non-IP network, the Company is not required to submit a Robocall Mitigation Plan. However, by June 30, 2021, it must register and certify in the FCC's Robocall Mitigation Database that it has fully implemented STIR/SHAKEN. (Skip remaining questions.)

4. Has the Company implemented the STIR/SHAKEN authentication framework on a portion of its network and the calls it originates on that portion of its network are compliance with [§64.6301\(a\)\(1\) and \(2\)](#) or not implemented on any portion of its network?

Partially implemented ☐ Not implemented ☐

By June 30, 2021, the Company must register in the FCC's Robocall Mitigation Database and upload a Robocall Mitigation Plan for the remainder of the calls that originate on its network.

5. Is the Company eligible for an extension of the June 30, 2021 STIR/SHAKEN implementation deadline under any of the following exemption criteria (§64.6304):

a) Company is a small voice service provider (a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider's affiliates)?

Yes _____ No _____

b) Company is a voice service provider that cannot obtain a SPC token?

Yes _____ No _____

c) Company has services that are scheduled for section 214 discontinuance, filed as of June 30, 2021?

Yes _____ No _____

d) Portions of the Company's network are non-IP and rely on technology that cannot initiate, maintain, and terminate SIP calls; and the Company filed a certification with the FCC by December 1, 2020 that, for those portions of its network, it has taken reasonable measures to implement an effective call authentication framework, consistent with §64.6306 (b)?

Yes _____ No _____

If yes to any subpart above, by June 30, 2021 the Company must register in the FCC's Robocall Mitigation Database and upload a Robocall Mitigation Plan.

Robocall Mitigation Plan Development

Responding to Traceback requests:

1. Identify and provide contact information for the Company's point of contact to handle traceback requests.

Name	Title	Contact Info
Brian Paboojian	President	323-784-3450 x3455

2. Describe the process the Company has in place to respond to traceback requests from the Industry Traceback Group, the FCC and law enforcement, including the specific tools it can use to conduct investigations of suspected illegal robocalls (e.g., call logs, Metaswitch call history) and the criteria that it intends to use to determine if the calls are actually illegal.

Call logs. We retain call logs for 3 years for all of our calls and can easily find the origination of any call.

Customer Vetting:

3. What process does the Company use to vet the identity of its retail and wholesale subscribers in order to determine the subscriber's identity and operational legitimacy ([See Best Practices, pp. 6-11](#))? Examples of information that might be used to vet a business subscriber's identity include physical business location, contact person(s), state or country of incorporation, federal tax ID and the nature of the customer's business.

We do not wholesale our service. We only work with business, no residential service. Business must not be an outbound call center. We check by the type of business they are based on their website.

Telephone Number Validation:

4. What process does the Company use to confirm an end user's right to use a telephone number? Does the Company intend to use a third-party validation service for this purpose? ([See Best Practices, pp. 13-14.](#))

We check all of the numbers for new clients from their existing phone bills prior to porting the numbers. Also, verify their number on their website.

International Call Originators:

5. Does the Company sell services to international call originators using North American Numbering Plan Numbers?

Yes _____ No X

If yes, what process does the Company use to validate that the calling party is authorized to use the telephone number or caller identity? ([See Best Practices, p. 14-16.](#))

Other Robocall Mitigation Practices:

6. What other ongoing robocall mitigation practices has the Company put in place on its IP and non-IP networks for the purpose of detecting illegal robocalls? For instance, does the Company use call analytics and other tools to detect potentially illegal robocalls originating from its customers or the customer of its resellers?

Our company is pretty small. If one of our clients started robo-calling we would see the spike in calls on our system. Also, we limit the amount of concurrent calls and calls per second per client.

7. If the Company determines that traffic is illegal, describe the steps the Company will take to mitigate that traffic. E.g., does it incorporate terms in customer contracts to allow it to suspend or terminate service to a customer suspected of generating illegal calls?

All of our clients are month to month service so we can terminate service with them at any time. In 10 years of business we have never had any issue with Robo calling on our system.

Call Blocking:

8. What process will the Company use to determine that certain traffic should be blocked?

High volume outbound calling that does not fit the nature of their business.

9. Does the Company have a process in place to block calls coming from companies not registered in the Robocall Mitigation Database by September 28, 2021? Describe how the Company will monitor the RMD to comply with that requirement.

We do not wholesale our service to resellers. So we control all calling on our system.

STIR/SHAKEN Implementation:

10. Is the Company working to implement STIR/SHAKEN authentication of calls originating on its network? Describe the Company's efforts and timeline.

NO, our upstream carriers will provides that service for us.

References:

§64.1600 Definitions

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(i) Intermediate provider. The term “intermediate provider” means any entity that carries or processes traffic that traverses or will traverse the public switched telephone network (PSTN) at any point insofar as that entity neither originates nor terminates that traffic.

§64.6300 Definitions.

(c) Foreign voice service provider. The term “foreign voice service provider” refers to any entity providing voice service outside the United States that has the ability to originate voice service that terminates in a point outside that foreign country or terminate voice service that originates from points outside that foreign country.

(l) Voice service. The term “voice service”—

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(1) Means any service that is interconnected with the public switched telephone network and that furnishes voice communications to an end user using resources from the North American Numbering Plan or any successor to the North American Numbering Plan adopted by the Commission under section 251(e)(1) of the Communications Act of 1934, as amended; and

(2) Includes—

(i) Transmissions from a telephone facsimile machine, computer, or other device to a telephone facsimile machine; and

(ii) Without limitation, any service that enables real-time, two-way voice communications, including any service that requires internet Protocol-compatible customer premises equipment and permits out-bound calling, whether or not the service is one-way or two-way voice over internet Protocol.

§64.6301 Caller ID authentication.

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(a) STIR/SHAKEN implementation by voice service providers. Except as provided in §64.6304 and 64.6306, not later than June 30, 2021, a voice service provider shall fully implement the STIR/SHAKEN authentication framework in its internet Protocol networks. To fulfill this obligation, a voice service provider shall:

(1) Authenticate and verify caller identification information for all SIP calls that exclusively transit its own network;

(2) Authenticate caller identification information for all SIP calls it originates and that it will exchange with another voice service provider or intermediate provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next voice service provider or intermediate provider in the call path; and

(3) Verify caller identification information for all SIP calls it receives from another voice service provider or intermediate provider which it will terminate and for which the caller identification information has been authenticated.

§64.6302 Caller ID authentication by intermediate providers.

Not later than June 30, 2021, each intermediate provider shall fully implement the STIR/SHAKEN authentication framework in its internet Protocol networks. To fulfill this obligation, an intermediate provider shall:

(a) Pass unaltered to the subsequent intermediate provider or voice service provider in the call path any authenticated caller identification information it receives with a SIP call, subject to the following exceptions under which it may remove the authenticated caller identification information:

(1) Where necessary for technical reasons to complete the call; or

(2) Where the intermediate provider reasonably believes the caller identification authentication information presents an imminent threat to its network security; and

(b) Authenticate caller identification information for all calls it receives for which the caller identification information has not been authenticated and which it will exchange with another provider as a SIP call, except that the intermediate provider is excused from such duty to authenticate if it:

(1) Cooperatively participates with the industry traceback consortium; and

(2) Responds fully and in a timely manner to all traceback requests it receives from the Commission, law enforcement, and the industry traceback consortium regarding calls for which it acts as an intermediate provider.

Best Practices for the Implementation of Call Authentication Frameworks (“Best Practices”), NANC Call Authentication Trust Anchor Working Group, issued by the FCC Wireline Competition Bureau, December 22, 2020, Public Notice DA 20-1526