

Robocall Mitigation Policy

Robocall Mitigation Policy Compliance with TRACED Act

Date	On behalf of	Change Summary
September 15, 2021	EC Data Systems, Inc. d/b/a FAXAGE	Initial Version
September 15, 2021	EC Data Systems, Inc. d/b/a FAXAGE	Modified to call out applicable §64.6304 extensions
May 23, 2023	EC Data Systems, Inc. d/b/a FAXAGE	Updated for June 30, 2023 deadline to remove small provider exemption and add detail regarding steps taken for TDM
March 29, 2024	EC Data Systems, Inc. d/b/a FAXAGE	Added items to comply with the Sixth Caller ID Authentication Report and Order

Objective: Establish and follow a policy that is compliant with the TRACED Act.

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant. The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- Details the reasonable steps taken to avoid originating illegal robocalls
- Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- Is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of EC Data Systems, Inc. d/b/a FAXAGE, and is an update intended to specifically address the required items in the Sixth Caller ID Authentication Report and Order.

II. Role in the Call Chain

EC Data Systems is engaged in the provision of Internet-based faxing services wherein subscribers may send and receive facsimile messages through one or more of the FAXAGE website, their email (FAXAGE email to fax and fax to email gateways), the FAXAGE API, the FAXAGE App and the FAXAGE Print Driver. Both EC Data Systems and FAXAGE (its d/b/a name) will be referred to as FAXAGE throughout this document.

FAXAGE originates calls on its customers' behalf for facsimile services only as detailed above. I.e.: FAXAGE does not act as a gateway or pass-through call paths from endpoints external to FAXAGE, but rather takes in requests to send faxes on its customers' behalf and then is the initial point where any call path would originate from a perspective of the telephone network.

III. Detailed information as to any STIR/SHAKEN implementation extension or exemption

FAXAGE has only TDM services in its network and believes it is temporarily exempt from the requirements of §64.6301, as that regulation applies to Internet Protocol networks (and more specifically, SIP) only and not to TDM networks.

Specifically, with respect to §64.6304, FAXAGE believes the following apply:

- FAXAGE qualifies as a Non-IP network under §64.6304 (d), which provides for a continuing extension. With respect to the §64.6303 (b), it is the intention of FAXAGE to work with our upstream carriers as well as our third-party telecom equipment vendors to implement a non-Internet Protocol caller identification authentication solution when such solution becomes available and/or to meet §64.6303 (a) by implementing SIP as/when that is feasible considering that fax traffic is generally better served with TDM than Internet Protocol networks.
- In the interim since FAXAGE's initial filing in September, 2021, FAXAGE has implemented ISUP call screening indicators as recommended in ATIS-1000095.v02 and has informed our upstream carriers of the same, should the upstream carriers choose to utilize that information to sign calls that they may transit over IP networks.
- FAXAGE certifies that it is not required to comply with STIR/SHAKEN because it lacks control over network infrastructure necessary to implement STIR/SHAKEN. See Report and Order, WC Docket 17-97, released March 31, 2020, at paragraph 40. Nonetheless, FAXAGE expects that in the event that any IP network technology were to be implemented by FAXAGE for originating calls, that originating calls will be signed by its wholesale carriers who are fully STIR/SHAKEN compliant.

With respect to the last point above, it should be noted that FAXAGE is not a carrier, but rather utilizes upstream carriers' telecommunications services in order to transmit and receive fax traffic. Thus, FAXAGE is not in direct control of the networks that would be responsible for any signing that could take place when/if calls are transmitted over IP networks upstream.

IV. Statement as to investigations

FAXAGE certifies that they are not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

V. OCN Number

FAXAGE does not have an OCN number at this time.

VI. Detailed Mitigation Plan

a. General Prohibition Against Illegal Robocalling

FAXAGE end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

FAXAGE existing TOS prohibit activities normally associated with Robocalling, which in the case of facsimile services is a prohibition against unsolicited commercial faxing utilizing the services. FAXAGE TOS additionally provides for action that can be taken for any abusive use of FAXAGE services, up to and including termination of the customer's service.

b. Know Your Customer

FAXAGE utilizes the mitigation technique of "Know Your Customer." FAXAGE is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Specifically, FAXAGE produces a daily report regarding number of faxes submitted for sending in the preceding 24 hours and month-to-date for all customers, where higher usage customers are called out and reviewed manually each day.

c. Network Monitoring

As detailed above, FAXAGE regularly reviews an automatically generated report that allows FAXAGE to identify any subscriber with unusually high outgoing call patterns and to take appropriate action.

FAXAGE has a history of responding promptly to any report from an end-user or a service provider of unwanted facsimiles or repeated facsimile calls to the end-user or the service provider's subscribers and has the technical capability to block subscribers from making facsimile call requests to any number that has requested not to receive those calls.

d. Traceback and Enforcement Cooperation

FAXAGE will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. FAXAGE will dedicate sufficient resources to provide prompt (within 24 hours of report) and complete responses to traceback requests.