

Robocall Mitigation Plan

Business Information

Caryco Tech
663 Cochran St #100
Simi Valley, CA 93065

Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (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

Caryco Tech is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, Caryco Tech has fully implemented STIR/SHAKEN. In compliance with the R&O, Caryco Tech submits this RMP and certification.

Know Your Customer ("KYC")

New Caryco Tech subscribers must provide name, telephone number, email address, and country. New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or that we have received signed authorization of ownership and are ported into the Caryco Tech platform ("Platform").

Human contact via phone call or in-person is required in order for new subscribers to gain access to the Platform to make outbound calls. A subscriber must provide payment through one of the following methods:

1. by phone.
2. by check via mail.
3. online via our payment site.
4. through autopay by filling out our ACH form and providing the required information.

Caryco Tech is a small company, and we have a small number of customers. As a result, We know our customers and understand their use cases.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls*, and *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, 38 FCC Rcd 5404 (2023), at ¶¶ 49-51, Caryco Tech provides the following information concerning its upstream voice service carrier.

Caryco Tech has one upstream provider from which it receives voice traffic:

Bandwidth.com
2230 Bandmate Way
Raleigh, NC, USA 27607
Timothy Verdi
tverdi@bandwidth.com

Caryco Tech has a master service agreement with its upstream provider. Caryco Tech and its upstream provider work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Caryco Tech maintains an AUP that subscribers must agree to before being permitted to use Caryco Tech's software and services. Among other things, the AUP prohibits:

- using the Services in ways that violate laws, infringe the rights of others, or interfere with the users, services, or equipment of the network;
- autodialing, continuous or extensive call forwarding, continuous connectivity, fax broadcast, fax blasting, telemarketing or any other activity that would be inconsistent with residential or small business usage, unless specifically agreed to otherwise in writing by Caryco Tech;
- impersonating any person or entity, including, or falsely stating or otherwise misrepresenting one's affiliation with a person or entity.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform. Subscribers can sign a form allowing them to use Caller IDs not purchased through our platform or verified by validation call for outbound calls, functionality that is restricted to customers with whom we've had human contact by phone call or in-person. This form:

- prohibits the sending of outbound traffic via the PSTN with Caller IDs not owned by the customer or the customer's subscribers; and

- states that, if Caryco Tech receives notice that the Customer's outbound calls through our platform are deemed to be spam, Caryco Tech has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

Caryco Tech limits the amount of simultaneous calls its customers can make. Caryco Tech also does not allow any autodialers on its network. Caryco Tech has a fraud mitigation system that alerts Caryco Tech when it recognizes unusual traffic.

Caryco Tech works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party who 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.

No third-party vendors are involved in deploying Caryco Tech's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Caryco Tech's 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.

Caryco Tech follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Caryco Tech will devote sufficient resources to provide prompt and complete resources to traceback requests. Caryco Tech commits to responding to traceback requests fully within 24 hours.

Blocking

Caryco Tech will promptly respond to Do Not Originate requests it receives from ITG. Caryco Tech has mechanisms to automatically block suspicious calls using internal analytics. If Caryco Tech's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Caryco Tech will take appropriate action which may include suspending or terminating the subscriber's use of Caryco Tech's network. Caryco Tech will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. Caryco Tech will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, Caryco Tech 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 Joseph Cary

I, Joseph Cary, President of Caryco Tech, do hereby certify, under penalty of perjury, the following:

(1) Caryco Tech has fully implemented STIR/SHAKEN in the IP portions of its network.

(1) Caryco Tech's Business name and primary address are as follows:

Caryco Tech
663 Cochran St #100
Simi Valley, CA 93065

(2) Caryco Tech uses the following business name: Axion Communications.

(3) Caryco Tech 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) Caryco Tech has a sole 10%+ owner and principal – Joseph Cary. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding. Caryco Tech has no subsidiaries or affiliates.

(6) Caryco Tech's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

(7) Caryco Tech has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

(8) Caryco Tech is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

(9) Caryco Tech's Operating Company Number is 015K.

/s/ Joseph Cary
Joseph Cary

Date: January 3, 2024