



Robocall Mitigation Plan

Company Name: Etopia Communications, LLC
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Pursuant to 47 C.F.R. § 64.6305 Etopia Communications LLC submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Etopia Communications LLC hereinafter also referred to as “Etopia” or “the company”) has in place to mitigate illegal robocalls. The company may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

Etopia is not an Affiliate, subsidiary or parent company of any other company. The company has never been sold or acquired by another company. The role the company plays in the network is as a Voice Service Provider for end users. Etopia carries mostly conference call voice traffic and is in the process of transitioning from an Interconnected PSTN (SS7) network to an all VOIP network. The company’s OCN numbers are 663D, 647F, and 961E. The owner and CEO of the company is Will MacHugh.

Etopia has fewer than 100,000 subscribers and is therefore eligible for the STIR/SHAKEN implementation exemption for small carriers under 47 CFR § 64.6304. The company requires this extension to complete the implementation of the STIR/SHAKEN technology. Etopia is judiciously working to prevent unlawful robocalls from originating on its network while in the process of installing the new STIR/SHAKEN authentication architecture. In the meantime, Etopia has implemented the following robocall mitigation plan to address unlawful robocall traffic:

Etopia only has a handful of customers which they have supported for years. While they do not have contracts, they do have basic guidelines posted on their website and a zero tolerance policy for illegal activity.

Etopia_ confirms that the upstream providers have a certification in the Robocall Mitigation Database. The company will not accept voice traffic from an unregistered provider. The Company has been informed of the upstream providers “Know-Your-Customer” guidelines and have provided them with the necessary KYC documentation they’ve requested that the company completes.

Etopia_ follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

Etopia_ also validates that the entity has a legitimate right to use its asserted calling numbers. The Company uses this information to support the attestation level it assigns to calls that it originates for that customer.

Ektopia prohibits customers from initiating illegal robocalls. If the Company discovers a customer misuses the numbers assigned to them in any way, they will immediately terminate the service.

Ektopia requires that upstream providers have a reasonable Robocall Mitigation Plan, including a vetting process for their customers as well as their upstream providers, and that they use call analytics to identify suspicious traffic.

Ektopia uses proprietary call analytics software to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The Company will immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If the Company determines that the traffic was likely unlawful, then the company will warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then the company will terminate their service.

Ektopia will comply fully with all conditions set forth in the FCC'S 2024 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Ektopia has designated an individual as a dedicated point of contact for addressing traceback requests. RMD Contact is Will MacHugh wmachugh@eltopia.com. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-rollback-group-itg/for-providers/>. The Company will respond promptly to inquiries from the Industry Traceback Group (ITG) within 24 hours.

If a pattern of questionable activity is detected Ektopia Inc. will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated. Requests from the ITG must be submitted in writing and include the following information:

Phone Number in Question:
Phone Number Dialed:
Date / Time Stamp:
Requestor's Name:
Requestor's Title:
Requestor's phone number:
Requestor's e-mail:

Ektopia will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated Robocall Mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls. The company will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. The company will cooperate fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls. Requests from the valid agency must be submitted in writing and include the following information:

Law Enforcement Agency Name:
Agency Address:
Requestor's Name:
Requestor's Title:
Requestor's phone number:
Requestor's e-mail:

Eltopia_ performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. The Company has not had any agency action or investigation due to suspected unlawful robocalling or investigations.

Eltopia_ is not subject to any Commission, Law Enforcement, or Regulatory Agency Action or investigation due to suspected unlawful robocalling or spoofing. Eltopia has not had any complaints or tracebacks.

Eltopia_ does not wish to publicize any private and/or classified information that has the potential to expose the Company to fraud and/or anti-competitive actions. Therefore, the Company will submit a redacted version for the public site and requests that the FCC keep the unredacted version **CONFIDENTIAL.**