

Robocall Mitigation Plan (RMP)

Qubic Telecom

Date: 3/29/2024

Introduction

This document outlines the Robocall Mitigation Plan for Qubic in compliance with the FCC's requirements as stated in the Sixth Report and Order, WC Docket No. 17-97. Our plan details the reasonable steps we are taking to prevent the origination of illegal robocalls.

1. "Know Your Customer" Procedures

In the STIR/SHAKEN ecosystem, Qubic Telecom ensures the accurate identification of subscribers based on a telephone number-linked caller identity. A subscriber at Qubic Telecom is defined as an entity with which we maintain a business relationship, involving the transmission, origination, and/or termination of calls on their behalf.

Qubic Telecom's Know Your Customer (KYC) procedures are initiated when a customer begins service with us. This process is vital for gathering essential information about the subscriber, which includes:

- The physical business location(s) of the subscriber;
- Contact details of person(s) responsible for communications;
- The specific nature of the subscriber's business.

These measures are part of Qubic Telecom's commitment to maintaining integrity and compliance within the telecommunications ecosystem, ensuring robust and reliable service for all our subscribers.

2. Know your upstream providers

In alignment with the directives issued by the Commission in "Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor," Seventh Report and Order in CG Docket 17-59, 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 (Released May 19, 2023) ¶¶ 49-51, Qubic Telecom hereby discloses information pertaining to our upstream voice carriers.

Qubic Telecom's voice traffic is sourced from the following upstream providers:

Bandwidth Inc.

900 Main Campus Drive, Suite 100, Raleigh, NC 27606

Qubic Telecom strictly accepts traffic solely from immediate upstream providers that are registered in the Robocall Mitigation Database. We consciously avoid receiving traffic from any providers who are not listed in this database, adhering to our commitment to combatting robocalls and ensuring compliance with industry standards.

3. Acceptable Use Policy

Qubic Telecom has established an Acceptable Use Policy that all subscribers are required to agree to before they can utilize Qubic's systems. This policy strictly prohibits activities including, but not limited to:

- The provision of altered, deceptive, or false information concerning the identity of the sender or the origin of a message or phone call;
- Any violation of applicable local, state, or federal laws;
- Non-compliance with accepted industry guidelines;
- Utilization of Qubic Telecom's services for engaging in, or in association with, fraudulent activities.

Under the contractual terms agreed upon with our subscribers, Qubic Telecom reserves the right to take appropriate actions, such as suspending or terminating services, in instances of any breach of the AUP.

4. Active monitoring

Qubic Telecom diligently monitors its network to detect unusual or suspicious calling patterns. We promptly investigate any alerts signaling illegal, abusive, or unacceptable usage of our services. Our approach to handling allegations of service abuse is grounded in consistency, fairness, and transparency towards our customers.

Upon completing an investigation, Qubic Telecom assesses and determines the necessary course of action. This may range from denying service, suspending or terminating service, to taking no action, depending on the specifics of the case. We are equipped to implement these actions immediately and efficiently, ensuring the integrity and security of our network and services for all customers.

5. Traceback Requests

Qubic Telecom pledges to promptly and thoroughly respond to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium. We are committed to cooperating fully with these entities in their investigations and efforts to halt any illegal robocall activities originating from our service. This commitment reflects our dedication to maintaining the integrity of our network and protecting consumers from unauthorized and illegal use of our telecommunications services.

6. STIR/SHAKEN Implementation

Qubic Telecom has fully implemented the STIR/SHAKEN protocol across our network, aligning with ATIS standards for call authentication. In practice, this means calls originating from Qubic Telecom customers using numbers assigned by us receive an 'A' level attestation. For calls made by our customers using third-party numbers, we provide a 'B' level attestation. This is upgraded to an 'A' attestation only when Qubic Telecom has verified the customer's rightful use of those third-party numbers. This implementation underscores our commitment to enhancing call security and trustworthiness within our telecommunications network.



Avery Robertson (Band Member)

Today at 11:31

Hi Team,

Thank you for confirming your amended submission to the RMD database. We will mark your account accordingly. Should there be any questions about your registration, the FCC may reach out to you directly.

As a Bandwidth voice customer using our phone numbers, your calls are automatically signed with full or "A" attestation. This would satisfy the stir/shaken requirement if all of your outbound traffic is being sent to our network.

Also there are 3 levels of attestation that can be indicated by the originating service provider:

- **Full (A) Attestation** - the service provider has authenticated the customer originating the call and they're authorized to use the calling number.
- **Partial (B) Attestation** - the service provider has authenticated the customer originating the call but can't verify they're authorized to use the calling number.
- **Gateway (C) Attestation** - the service provider has authenticated from where it received the call, but can't authenticate the call source (e.g., International Gateway call).

As I hope that brings in some clarity around how calls are signed.

I hope this is clear but if you have any further questions please do get in touch.

We will move forward and close this ticket, but should you have any further questions, please don't hesitate to reach back out.

Best
Avery



Daniel Lee

Today at 11:30

I was also wondering if our traffic is fully supported by Bandwidth's stir/shaken capabilities, which would give us the complete implementation of stir/shaken caller ID framework.