

Robocall Mitigation Plan

Business Information

The Harbor City Corp. dba ACC Telecom
10005 Old Columbia Rd.
STE M-150
Columbia, MD 21046

Contact Information

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Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outlines "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" procedures;
- 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

The Harbor City Corp. ("ACC") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. Because ACC lacks control of the infrastructure necessary to implement STIR/SHAKEN, it is not required to be STIR/SHAKEN compliant. In compliance with the R&O, ACC submits this RMP and certification.

Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with ACC in which we transmit, originate, and/or terminate calls on behalf of the subscriber.

ACC has an extensive KYC program. ACC vets all prospective subscribers to ensure that they are legitimate businesses. The vetting process consists of verifying contact information online including

company name, e-mail addresses/email domain, web address, phone numbers, and office location address. This information must match with what the contact presented to ACC. ACC also utilizes social media sites, Better Business Bureau reports, and a variety of online searches to determine if any spam/fraud complaints have been placed against the prospective subscriber. ACC also collects a deposit upfront for the first month of service. Where situations warrant, ACC requires a credit check if there are any lingering doubts regarding the prospective subscriber's intentions for service. ACC flags any prospective subscriber that is only asking for "new" numbers and is not porting numbers or asks to change their caller ID name or number to a different name or number than what they originally signed up for (subscriber must present legal documentation of the business name change to change their caller ID name).

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls 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* (Rel. May 19, 2023) ¶¶ 49-51, ACC provides the following information concerning its three upstream voice service carriers.

PayG LLC dba SkySwitch
 Arborcrest 1, 751 Arbor Way
 Suite 150
 Blue Bell, PA 19422
 Phone: 747.777.8100
 Email: support@skyswitch.com

CoreDial LLC
 Arborcrest 1, 751 Arbor Way
 Suite 150
 Blue Bell, PA 19422
 Phone: 215.297.4400
 Email: cdsupport@skyswitch.com

Bandwidth.com
 2230 Bandmate Way
 Raleigh, NC 27607
 Phone: 855-290-8135
 Email: tacsupport@bandwidth.com

ACC and its upstream providers have agreed to work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests. ACC's upstream providers are listed as STIR/SHAKEN compliant in the Robocall Mitigation Database.

Monitoring With Analytics

ACC works with its upstream providers to detect calling patterns consistent with illegal robocalls. 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. ACC heavily monitors its subscribers' minute use. ACC's internal tools flag any customers whose usage is considered

outside the industry average (we use a threshold of 400 minutes per extension/user per month). In addition, ACC utilizes a combination of internal tools to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles. ACC will suspend or cancel any account that is flagged for inappropriate minute usage, spam-techniques, or non-payment.

The third parties that ACC works with to deploy its analytics are (1) Bandwidth.com (2) PayG LLC and (3) CoreDial LLC.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, ACC 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;
- 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.

ACC follows Industry Traceback Group ("ITG") recommended best industry practices and cooperates with ITG, the FCC, and law enforcement entities in traceback investigations. To allow for timely and comprehensive responses, ACC devotes sufficient resources to provide prompt and complete resources to traceback requests. ACC certifies that it will respond to all traceback requests within 24 hours of receiving same.

Blocking

ACC will implement Do Not Originate requests it receives from the ITG. ACC works with its upstream carriers to block suspicious calls. If ACC and its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, ACC will take appropriate action which may include suspending or terminating the subscriber's use of ACC's network.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. ACC will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, ACC 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 Kristin Hunt

I, Kristin Hunt, Director of Operations of The Harbor City Corp. dba ACC Telecom ("ACC") do hereby certify, under penalty of perjury, the following:

- a. ACC is not required to implement STIR/SHAKEN, due to its lack of control over the necessary infrastructure.
- b. ACC's business name and primary address are as follows:

The Harbor City Corp.
10005 Old Columbia Rd.
STE M-150
Columbia, MD 21046

- c. The Harbor City Corp. has one dba: ACC Telecom.
- d. Outside of the dba listed above, The Harbor City Corp. has not previously used any other business names.
- e. 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.
- f. The individuals with 10% or more ownership ACC are: Susan Hunt (51%) and Barry Hunt 49%.
- g. ACC's role in the call chain is that of a voice service provider with no STIR/SHAKEN implementation obligation.
- h. ACC is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. ACC has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. ACC is not required to, and does not have, an Operator Code Number.

DocuSigned by:

Kristin Hunt

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Kristin Hunt