

Robocall Mitigation Plan

Business Information

Barry Communications Inc.
146 West Boylston Drive
Worcester MA 01606

Contact Information

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Overview

In the Federal Communications Commission ("FCC") 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 an 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

Barry Communications Inc. ("Barry") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates Barry's RMP. As certified in the FCC's Robocall Mitigation Database, Barry has fully implemented STIR/SHAKEN. In compliance with the R&O, Barry submits this RMP and certification.

Know Your Customer ("KYC")

Barry's KYC program involves obtaining specific information when a subscriber signs up for service. This process includes collecting such information such as:

- name;
- phone number;
- physical business location;
- contact person(s); and
- nature of the customer's business.

Barry originates and transmits calls solely from known approved endpoints.

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, Barry provides the following information concerning its upstream voice service carriers.

Bandwidth, Inc.
2230 Bandmate Way
Raleigh NC 27607
Stephen Thayer
(919) 704-3069
voicesecurity@bandwidth.com

Verizon
22001 Loudoun County Parkway
Ashburn VA 20147
Lulia Barakat
(469) 265-6273
lulia.barakat@verizon.com

Barry has master service agreements with its upstream providers. Barry and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Barry maintains an Acceptable Use Policy ("AUP") to which potential customers must agree before being permitted to use Barry's network. Barry's AUP is here: <https://www.barrycommunications.com/wp-content/contracts/aup.pdf>

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Barry and/or obtained by Barry from one of its underlying carriers for use by the subscriber. In most cases, Barry directly manages the TNs used by its subscribers. Barry tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Barry's assignment of the TN to its subscriber.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Barry, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Barry will attest calls originated with these TNs.

When originating a call, Barry checks the calling party number against Barry's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Analytics for Monitoring Traffic

Barry 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.

Barry uses a third-party vendor for traffic analytics – Sansay, Inc.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our 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;
- increased scrutiny for customers who are involved in campaigns containing “red flag” terms (including but not limited to: Social Security, Medicare, Auto Warranty Final Courtesy, Amazon, DirecTV, gift cards, disconnection threats, emergency payment, and/or credit card interest rate reduction);
- re-verifying the information requested in our KYC procedures when a client initiates a new campaign, or if there is suspicious activity (including but not limited to a significant change in the number of calls routed through our platform, a change in the client's call pattern, and/or an industry change); and
- Our compliance team is trained on common TSR and TCPA issues and will alert/train the customer if a suspected violation is found.

Barry follows Industry Traceback Group (“ITG”)-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Barry will devote sufficient resources to provide prompt and complete resources to traceback requests.

Barry will respond to all traceback requests from the FCC, the Federal Trade Commission (“FTC”), and other law enforcement agencies as well as the Industry Traceback Group (“ITG”) within twenty-four (24) hours of receiving notice of the request.

Barry will investigate suspicious activity found by its monitoring systems or reported to Barry by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Barry contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform. Barry may also notify law enforcement authorities.

For all new and renegotiated Barry contracts governing the transport of voice calls, Barry will use best efforts to contractually require Barry's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

Barry will implement Do Not Originate requests it receives from the ITG. If Barry's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Barry will take appropriate action which may include suspending or terminating the subscriber's use of Barry's network. Barry will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Barry 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, Barry 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 Casey Hutchinson

I, Casey Hutchinson, Operations Manager of Barry Communications Inc. ("Barry"), do hereby certify, under penalty of perjury, the following:

- (a) Barry has fully implemented STIR/SHAKEN in the IP portions of its network.
- (b) Barry's Business name and primary address are as follows:

Barry Communications Inc.
146 West Boylston Drive
Worcester MA 01606
- (c) Barry's sole dba is Barry Electric.
- (d) Barry has no previous dba.
- (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 following persons/entities own more than 10% of Barry: Barry Gerhardt.
- (g) Barry has no subsidiaries or affiliates.
- (h) None of the persons/entities listed herein have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (i) Barry's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (j) Barry has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (k) Barry is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (l) Barry's Operating Company Number is 422L.



Casey Hutchinson