

Amazing 7 LLC Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Amazing 7 LLC, pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan.” This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, Amazing 7 LLC’s status with respect to STIR-SHAKEN implementation is as follows:

- Amazing 7 LLC has no STIR/SKAKEN authentication framework on any portions of its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using Amazing 7 LLC ‘s service to originate illegal robocalls. Telnix provides STIR/SKAKEN authentication in its entirety, and we have been advised that this declaration is accurate. Telnix is handling all STIR/SKAKEN authentication, but Amazing 7 LLC will still be handling all requests by the FCC for robocall mitigation.

II. TRACEBACK REQUESTS

As noted above, Amazing 7 LLC will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, Amazing 7 LLC will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same. Within Appendix A to this Plan, Amazing 7 LLC identifies a single point of contact for receiving all traceback requests.

As part of its efforts to assist in the successful traceback of illegal robocalls, Amazing 7 LLC will going forward include within its carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged. In part, these related contract provisions will specify the need for parties to promptly identify the upstream provider from which a suspected illegal robocall entered its network or the customer of the service from which the call originated.

III. CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, Amazing 7 LLC will use best practices in vetting the identity of all its voice service subscribers, personally. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, Amazing 7 LLC looks to confirm the identify of customers using its voice services through collecting information such as physical customer location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer’s business.

Amazing 7 LLC efforts to vet retail and business subscribers occurs during the process of provisioning customer requested services (for example in appropriately sizing the facilities to their claimed intended use), executing the Amazing 7 LLC's required service agreements, and granting the customer the right to use telephone number resources. Amazing 7 LLC primarily focuses on small businesses and small government entities. Many of our customers are backed by personal relationships and face to face knowledge of ownership and operation.

Further, with respect to meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, Amazing 7 LLC:

- Utilizes service agreements and acceptable use policies as a means of preventing its new and existing subscribers from using their voice and broadband services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of Provider provided services include terms indicating specifically to all customers that their services should not be used for the purpose of making illegal robocalls, and the Provider reserves authority within its service agreements to suspend or terminate a subscriber's voice service for violating applicable service-related terms.
- Has established a routine process for monitoring of the usage and quality of its network facilities and conducts recurring and timely reviews of its call detail records (CDRs) to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate use of the network for originating illegal robocalls. In those instances where the Provider identifies activity or a pattern consistent with illegal robocalls the customer will be contacted within twenty-four hours for further investigation and possible action regarding their subscribed to voice service.
- Requires customers to allow Amazing 7 LLC full access to all their VOIP systems and call data records (CDRs) to execute quick and accurate responses to any requests made by any governing bodies for Traceback requests. Because of the intimate knowledge of Amazing 7 LLC's customers, and the limited number of them, this part of our customer agreement is accepted across all of Amazing 7 LLC's clients. This information we collect includes higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); originating calls of short duration and low call completion percentages; originating calls with sequential called to number dialing patterns; repeated calls made to invalid numbers; and calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.

IV. TELEPHONE NUMBER VALIDATION PRACTICES

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). In accord with industry best practices, the Provider has procedures in place to confirm the calling customer's right to use a telephone number. Specifically, a subscriber of Amazing 7 LLC's services is permitted to use a telephone number as their caller identity if a number is directly managed by the Provider and/or obtained by the Provider via an underlying partner.

Further, for: (1) single line voice service subscribers, both services connected via TDM or IP, the switching equipment has been set up to only accept calls from the number assigned to that subscriber; and (2) subscribers with multi-line telephone systems, for both services connected via TDM or IP, Amazing 7 LLC screens all originating calls and only allows calls to be connected if the originating number matches one of

the numbers assigned to the subscriber. These screening capabilities enable an automated and secure method of validating originating telephone numbers.

V. INTERNATIONAL CALL ORIGINATORS

Amazing 7 LLC is not currently an international voice services provider. If at any time Amazing 7 LLC does sell its services to customers which are international call originators using North American Numbering Plan resources, it will familiarize itself with and develop best practices for fulling vetting such customers and performing telephone number validation on all international originated calls.

VII ONGOING ROBOCALL MITIGATION PRACTICES

Amazing 7 LLC monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns consistent with illegal robocalls are detected or Amazing 7 LLC otherwise suspects illegal robocalling or spoofing is taking place on its network, it immediately seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action. The actions taken may include, but are not limited to: initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name; terminating the party's ability to originate, terminate, or route calls on Amazing 7 LLC's network; and providing notice to law enforcement authorities.

As part of its Plan to mitigate and prevent any originating robocalls on its network, Amazing 7 LLC is committed to early identification and investigation of possible robocalling situations. In monitoring usage of its network, particular attention is given to: (1) higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); (2) originating calls of short duration and low call completion percentages; (3) originating calls with sequential called to number dialing patterns; (4) repeated calls made to do-not-call registry or invalid numbers; and (5) calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.

Appendix A

Traceback Request Single Point of Contact:

Name: Eric Francese

Title: Senior Technical Engineer

Phone Number: 719-358-2382

Email Address: eric@amazing7llc.com

Upstream Provider Information:

Name of Upstream Provider: Telnyx