

Robocall Mitigation Plan

Business Information

Menlo, Inc.
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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";
- 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

Menlo, Inc. ("Menlo") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. As certified in the FCC's Robocall Mitigation Database, Menlo has fully implemented STIR/SHAKEN. In compliance with the R&O, Menlo 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 Menlo in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Menlo's subscribers are limited to public school districts with which Menlo has other business relationships. Menlo also manages the systems connected with endpoints and control caller IDs

sourced from these systems. Consequently, Menlo has many ways to connect its customers with phone numbers it provides to them.

Acceptable Use Policy ("AUP")

Menlo maintains an AUP that subscribers must sign before being permitted to use Menlo's system. Menlo's AUP is as follows:

Prohibited Uses. Client agrees not to use the VOIP Service in a manner that is actually or potentially libelous, threatening, harmful, harassing, indecent, obscene, in violation of the intellectual property rights of any party, or is otherwise unlawful under any applicable law or regulation. Client agrees not to engage in any activity that interferes with or disrupts the Service or associated servers, networks, or software; prevents or restricts other clients from using the Services; or damages any Provider or third-party property. Client agrees not to reproduce, duplicate, copy, sell, trade, or resell the Service provided under Client's account(s). Client agrees not to use the Service for autodialing or predictive dialing; continuous or extensive call forwarding; constant dialing; iterative dialing; fax broadcast; fax blasting; junk faxing; fax spamming; transmitting broadcasts or recorded material; sending unsolicited messages or advertisements; telemarketing; sending bulk and/ or junk email, voicemail, or faxes; call center operations or other bulk call-in lines; taking any action to attempt to mislead others as to the identity of the sender or the origin of any communication; or any other activity outside the scope of reasonable internal business usage. Client agrees not to (1) re-classify or re-originate traffic or take any other action to intentionally make traffic appear as if it: (i) is anything other than the type of traffic delivered to such called party (including but not limited to making TDM originated traffic appear to be IP originated) or (ii) originated from a place or on a type of equipment different from the place or type of equipment from where it, in fact, originated; or (2) modify, alter, or delete in any manner calling party number information, originating point codes, or any other signaling information or call detail in connection with the transport and termination of traffic to the called party. Client agrees not to access or attempt to access the Service by any means other than the interface provided by Provider, including but not limited to any automated means such as the use of scripts or web crawlers. Client agrees not to use any trademark, service mark, trade name, or logo of any company or organization in conjunction with the Service in a manner that is likely or intended to cause confusion about the owner or authorized user of such mark, name, or logo.

Know Your Upstream Provider

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, Menlo provides the following information concerning its upstream voice service carrier:

IntelPeer Networks LLC
155 Bovet Rd.
Suite 405
San Mateo, CA 94402
Vu Tran
720.889.9580
vtran@intelepeer.com

Menlo's agreement with its upstream provider contains no provision specific to robocall mitigation. Menlo has, however, received assurances from its provider that it will, and will continue to, sign calls transmitted to Menlo, and will work closely with Menlo to mitigate illegal robocall traffic.

Monitor Traffic With Analytics

Menlo works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Menlo detects a calling pattern consistent with illegal robocalls, we will identify the party 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 system.

TransNexus is the only third-party vendor involved in deploying Menlo's analytics

Investigate Suspicious Activity

Menlo investigates suspicious activity found by its monitoring systems or reported to Menlo by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Menlo 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.

Menlo is familiar with and uses best efforts to follow the Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Menlo will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

Menlo has mechanisms to block suspicious calls using internal analytics. If Menlo's monitoring system identifies suspected robocalling patterns that are confirmed with further investigation, Menlo will take appropriate action which may include suspending or terminating the subscriber's use of Menlo's network.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Menlo 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, Menlo 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.

This plan was reviewed as of 8/10/2026. The undersigned certifies that all the information listed herein is complete and up to date.

Certification of Richard Bustamante

I, Richard Bustamante, Director of Finance of Menlo, Inc. ("Menlo") do hereby certify, under penalty of perjury, the following:

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

Menlo, Inc.
1901 McGee St.
Suite 200
Kansas City, MO 64108

- c. Menlo's currently uses the following d/b/a's: K12itc and Civic ITC
- d. With the exception of the above-referenced d/b/a's Menlo has no other previously used 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. Menlo has one owner: Brad Sandt, who owns 100% of Menlo.
- g. Menlo's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- h. Menlo and its interest holder have not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Menlo and its interest holder have not subject been to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Menlo's Operator Code Number is 607K.



Richard Bustamante