

Business Information**OTG GROUP Corp**

6903 3rd Ave

Brooklyn, NY 11209

Contact Information

Kareem Tantawy

Chief Technology Officer (CTO)

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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, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that an RMP include:

- "Know Your Customer" procedures;
- "Know Your Upstream Provider" details;
- Ownership information;
- A description of any call analytics systems 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

OTG GROUP Corp is dedicated to preventing illegal calls from originating on its network and actively monitoring the calls traversing its systems. OTG GROUP Corp has fully

implemented STIR/SHAKEN and submits this RMP and certification to comply with the FCC's R&O.

Know Your Customer (KYC)

The accurate identification of a subscriber within the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is defined as an entity that has a business relationship with OTG Group Corp, where OTG Group Corp transmits, originates, and/or terminates calls on behalf of the subscriber.

OTG Group Corp's Know Your Customer (KYC) program ensures the collection of specific subscriber information during the onboarding process. This includes gathering details such as:

- The subscriber's physical business location.
 - Business name and Tax ID. (we provide services to U.S. entities only).
 - Contact person(s) associated with the subscriber.
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Acceptable Use Policy (AUP),

OTG Group Corp maintains an Acceptable Use Policy (AUP) that all subscribers must agree to before being granted access to its system. The AUP explicitly prohibits the following:

- Providing altered, deceptive, or false information about the sender's identity or the origin of a message or phone call.
- Violating any applicable local, state, or federal laws.
- Using OTG Group Corp's services to engage in or facilitate fraudulent activities.

OTG Group Corp's terms of service specify that violations of the AUP may result in actions up to and including suspension or termination of the subscriber's service.

Know Your Upstream Provider

In accordance with the Commission's directive outlined 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, OTG Group Corp provides the following information regarding its upstream voice service carrier:

Bandwidth.com

900 Main Campus Drive

Suite 100

Raleigh, NC 27606

Contact: Derek Hren

Phone: (855) 864-7776

Email: dhren@bandwidth.com

OTG Group Corp's agreement with its upstream provider does not include provisions specific to robocall mitigation. However, OTG Group Corp has received assurances from its upstream carrier that it has implemented, and will continue to implement, measures to sign calls transmitted to OTG Group Corp and will collaborate closely to mitigate illegal robocall traffic.

Monitor Traffic with Analytics

OTG Group Corp collaborates with its upstream carrier to analyze high-volume voice traffic and identify patterns consistent with robocalls. If OTG Group Corp detects a calling pattern indicative of illegal robocalls, it will identify the responsible party and take appropriate action. Such actions may include, but are 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 its system.

No third-party vendors are involved in deploying OTG Group Corp's analytics.

Investigating Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, OTG Group Corp's technical operations team is alerted and follows established procedures for investigating such subscribers. These procedures include, but are not limited to:

- Reviewing recent and historical call detail records to benchmark against expected trends.

- Analyzing recent and past account activity and purchases.
- Investigating potential system issues that may be causing unusual behavior.
- Verifying the validity of the call origination path.
- Contacting the subscriber to understand their specific use case and confirm that the activity is legitimate.

OTG Group Corp is familiar with and makes its best efforts to adhere to the Industry Traceback Group (“ITG”)-recommended best practices and fully cooperates in traceback and trace-forward investigations. To ensure timely and comprehensive responses, OTG Group Corp allocates sufficient resources to promptly and thoroughly address traceback requests.

Blocking

OTG Group Corp will implement Do Not Originate requests it receives from the ITG. OTG Group Corp has procedures to block suspicious calls. If OTG Group Corp identifies suspected robocalling patterns that are confirmed with further investigation, it will take appropriate action, which may include suspending or terminating the subscriber’s use of OTG Group Corp’s system. OTG Group Corp will cooperate with Investigative Bodies by providing a single point of contact to address traceback requests from law enforcement, the FCC, and/or the ITG, as well as documenting requests and actions taken in response.

Plan Updates

This plan, along with industry best practices, must evolve to address the dynamic challenges of mitigating illegal robocalling. OTG Group Corp will monitor industry standards and continuously refine its internal processes to ensure this plan and our systems remain effective in tackling this ever-changing issue.

In the event of any material changes to this plan, OTG Group Corp will promptly distribute the updated version to employees, consultants, and contractors, and will file the update with the FCC Robocall Mitigation Database within ten (10) days of the revision.

Certification of Kareem Tantawy

I, Kareem Tantawy, CTO of OTG GROUP Corp, certify under penalty of perjury that:

- A. OTG GROUP Corp has fully implemented STIR/SHAKEN in the IP portions of its network.
- B. OTG GROUP Corp's business name and primary address are:
OTG GROUP Corp
6903 3rd Ave
Brooklyn, NY 11209
- C. OTG GROUP Corp has not used any other business names.
- D. OTG GROUP Corp is not subject to enforcement action due to suspected unlawful robocalling.
- E. OTG Group Corp has one owner: Osama A Ali, who owns 100% of OTG GROUP Corp.
- F. OTG GROUP Corp has no affiliates or subsidiaries.
- G. OTG GROUP Corp serves as a voice service provider with a STIR/SHAKEN implementation obligation.
- H. OTG GROUP Corp cooperates fully with the FCC, law enforcement, and ITG for traceback and related investigations.

Karem Tantawy

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Date: 12/18/2024