

Robocall Mitigation Plan

Business Information

GoMonthly I.T. Corp. ("GoMonthly")
6240 Joanne Lane, Altoona, WI 54720

Contact Information

Anthony Beltz
President
715-834-9797
tony@gomonthlyit.com

Overview

In the Commission's recent 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 a RMP include:

- "know your customer" procedures;
- 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

GoMonthly is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. GoMonthly is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, GoMonthly was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as GoMonthly now file RMPs. This document delineates GoMonthly's RMP. Because GoMonthly does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, GoMonthly works closely with its upstream provider to carry out the required mitigation functions.

Know Your Customer ("KYC")

GoMonthly I.T. Corp verifies every customer that their business is reputable and legitimate. This means meeting the owners/management, performing a site survey and verifying their business model. The executive officers are required to provide their name, address, cell number and banking account information. We do not allow customers to modify their caller ID. All phone systems are installed at the customer's location. We do not offer any cloud services. We also require a static WAN IP for security.

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

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, GoMonthly provides the following information concerning its upstream voice service carrier.

GoMonthly has three upstream providers from which it receives voice traffic:

1. Bandwidth Inc.
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
voicesecurity@bandwidth.com
2. Inteliquent, Inc. (d/b/a Vitelity)
550 W. Adams St.
Suite 900
Chicago IL 60661
Stacy Graham
stacy.graham@sinch.com
3. Intrado Communications, LLC (d/b/a Flowroute)
11808 Miracle Hills Drive
Omaha Nebraska 68154
Todd Kawamura
tkawamura@flowroute.com

GoMonthly has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to GoMonthly, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to GoMonthly. GoMonthly 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")

GoMonthly maintains an AUP that subscribers must sign before being permitted to use GoMonthly's network. Among other things, the AUP prohibits:

- any use of the services or any other action that causes a disruption in the network integrity, or threatens or compromises the security of GoMonthly, its vendors, or the services whether directly or indirectly;

- transmitting any unlawful, harassing, defamatory, abusive, threatening, harmful, vulgar, obscene, indecent, or otherwise objectionable communications or material of any kind or nature;
- reselling, transferring or charging for the services or the equipment without the advance express written permission of GoMonthly;
- (with regard to the plans with unlimited minutes or faxing) auto-dialing, continuous or extensive call forwarding, continuous connectivity, fax broadcast, fax blasting, telemarketing (including without limitation charitable or political solicitation or polling), call center operations, junk faxing, fax spamming, calling/faxing any person (through the use of distribution lists or otherwise) who has not given specific permission to be included in such a process or any other activity that would be inconsistent with reasonable business usage; and
- violating any applicable local, state, or federal law.

GoMonthly's contractual terms with subscribers specify that GoMonthly may take action up to suspension or termination of service for violation of the AUP.

Mitigation During Service

GoMonthly works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

GoMonthly I.T. Corp requires all VoIP customers to have a static WAN IP to maintain strict security. In addition, all registered SIP Trunk passwords between Service Provider and the phone system are unique and randomly generated with strong password. We run daily reports looking for excessive usage. In addition, our upstream provider is analyzing our usage looking for illegal calls.

Analytics for Monitoring Traffic

GoMonthly works with its upstream provider to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- 7, 14, and 30 day call volume rolling average on a daily basis;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, GoMonthly works with its upstream provider to follow 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; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Because GoMonthly does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in GoMonthly's analytics.

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

GoMonthly works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to GoMonthly by subscribers or third parties. The investigation could potentially result in opening a traceback request or with GoMonthly contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

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

Blocking

GoMonthly will implement Do Not Originate requests it receives from the ITG. GoMonthly's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If GoMonthly and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, GoMonthly will take appropriate action which may include suspending or terminating the subscriber's use of GoMonthly's service. GoMonthly will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as 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 response to the dynamic nature of mitigating illegal robocalling. GoMonthly 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, GoMonthly 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 Anthony Beltz

I, Anthony Beltz, President of GoMonthly, do hereby certify, under penalty of perjury, the following:

- (1) GoMonthly, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) GoMonthly 's Business name and primary address are as follows:

GoMonthly I.T. Corp
6240 Joanne Lane
Altoona, WI
64720
- (3) GoMonthly has no other business names in use
- (4) GoMonthly has not previously used any other business name.
- (5) GoMonthly has the following more than 10% owners/directors: Anthony Beltz. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) 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.
- (7) GoMonthly's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) GoMonthly has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) GoMonthly is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) GoMonthly's operator company number is 504k.



Anthony Beltz