

Robocall Mitigation Plan

Business 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, 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 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

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

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 Facet in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Facet collects subscriber information when it sets up their phone systems. Facet installs phone systems for all our subscribers. This information includes subscribers' business addresses, phone numbers, responsible employees' names, credit card details, and the nature of the subscribers' businesses.

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,

Facet has no upstream voice service carriers. All the calls that we send to Commio are initiated by our PBX customers on their IP phones.

Commio
5420 Wade Park Blvd.
Suite 100
Raleigh NC 27607
Katie Raddick
kraddick@commio.com

To the extent that Facet were to receive information from law enforcement or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. While Facet's agreement with its upstream provider contains no provisions specific to robocall mitigation, Facet has received assurances from that provider that it has, and will continue to, sign calls transmitted to Facet, and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic.

Acceptable Use Policy ("AUP")

Facet maintains an AUP that subscribers must agree to before being permitted to use Facet's system. Facet's AUP is here: <https://www.commio.com/aup/>.

Analytics for Monitoring Traffic

Facet works with its upstream provider to identify behaviors which indicate illegal call activity. Facet reviews outbound call logs, traffic analyses, and other analytics regularly to monitor for any possible abuse.

No third parties are involved in deploying Facet's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Facet works with its upstream provider to follow defined procedures on investigating such subscribers. Facet actively monitor calls from all customers. The outbound call logs are checked manually, and the customers are blocked if necessary.

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

Blocking

Facet will implement Do Not Originate requests it receives from the ITG. Facet's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If Facet and/or our upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Facet will take appropriate action which may include suspending or terminating the subscriber's use of Facet's service. Facet will cooperate with Investigative Bodies regarding traceback requests from law enforcement, the FCC, and 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. Facet will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

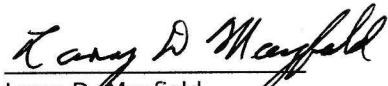
In the event of any material change to this plan, Facet will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Larry D. Mayfield

I, Larry D. Mayfield, Vice President of Facet Corp. ("Facet"), do hereby certify, under penalty of perjury, the following:

- a. Facet, 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.
- b. Facet's business name and primary address are as follows:

Facet Corp.
5999 Summerside Drive
Dallas, TX 75252
- c. Facet has no other business names in use.
- d. Facet has not previously used any other business name.
- 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. Facet's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- g. The persons that have 10% or more ownership interest in Facet are: James Bryant, John Montpas, Larry Mayfield, Paul Vance, M. Douglas Wetherill. Facet has no affiliates or subsidiaries.
- h. Facet has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Facet is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Facet is not required to, and does not have, an operating company number.


Larry D. Mayfield