



Robocall Mitigation Plan for Convo Communications, LLC

Pursuant to Section 64.6305 of the Commission's rules, Convo Communications, LLC ("Convo") submits its Robocall Mitigation Plan to the Federal Communications Commission ("FCC" or "Commission").

Convo is a video relay service provider that allows persons with hearing or speech disabilities who use American Sign Language ("ASL") to use video equipment to communicate with voice telephone users. A video link allows a communication assistant ("CA") and the ASL user to view and sign with each other, and the CA is also connected to a user on the voice side of the call through telephone. The CA interprets and relays the conversation back and forth between the two parties. Convo is the FCC's only fully certified Video Relay Service ("VRS") provider. These FCC rules apply to interpreters, customer support personnel, operations personnel, and all other Convo employees, agents and contractors. It is imperative that Convo VRS personnel, agents and contractors clearly understand the Telecommunications Relay Services ("TRS") rules and their obligation to comply with these rules and other FCC requirements in the provision of VRS.

Convo procures the North American Numbering Plan ("NANP") numbering resources necessary for VRS from local exchange carriers, and the telecommunications resources necessary to send and receive calls from the public switched telephone network from telecommunications carriers in pursuant to Section 64.11 of the Commission's rules.

STIR/SHAKEN Implementation Status

With respect to STIR/SHAKEN implementation status, Convo is not a telecommunications carrier or provider of private telecommunications, and thus does not have an FCC Form 499A on file with the FCC. It therefore is unable to obtain a Service Provider Code (SPC) token under the Governance Authority's revised SPC Token Access Policy. As a consequence, Convo is exempt from implementing STIR/SHAKEN. Convo has implemented the robocall mitigation plan described below. Convo's underlying NANP numbering resource providers, Lumen and Bandwidth, authenticate Convo's calls that originate on their respective systems and are subject to STIR/SHAKEN.

"Know-Your-Upstream Provider" Procedures

Because Convo does not control any network infrastructure in connection with its provision of VRS, Convo does not have any upstream providers. To the extent Convo could be considered a voice service provider, its only upstream provider would be Bandwidth and Lumen which supplies Convo with underlying with its underlying NANP numbering resource providers,



Lumen and Bandwidth, that they will authenticate Convo's calls that originate on their respective systems and are subject to STIR/SHAKEN. Additional information regarding Bandwidth's STIR/SHAKEN implementation can be found at: <https://www.bandwidth.com/regulations/stir-shaken/>.

Convo's downstream provider is Bandwidth where Convo resells Bandwidth's voice services for consumption by a separate end user placing outbound calls to US destinations in some manner. By reselling, Convo is not directly consuming Bandwidth's voice services (such as for internal employee communication, in which instance Bandwidth would consider itself the VSP). Convo relies on FCC and Telecommunications Relay Services (TRS) User Registration Database (URD) to confirm the validity of our users in order to obtain a ten-digit number (TDN) which is a preventive measure to ensure that any end-users of Convo are not robocallers, but actual human callers. As a provider of upstream voice services, Convo maintains its awareness of the purpose of VRS calls and the legitimacy of call transmission services. Further, Convo, in the interest of providing the highest quality services to all of its voice service customers through Voice Call Over (VCO), is committed to taking those steps necessary to ensure that providing connectivity are equally committed to monitoring our networks and preventing use for the transmission of illegal robocalls.

Convo exercises due diligence in contracting with underlying providers. Prior to contracting, it researches the nature of the provider's business and collects from each a Form W-9, that includes the provider's business name, type of entity, address, and taxpayer identification number. It also obtains a business contract for each provider so that it can immediately address any issues with the provider.

Know Your Customer Practices & Screening

FCC TRS rules (Section 64.611) require Convo, as a VRS provider, to review and submit the following registration information to the Telecommunications Relay Service-User Registration Database ("TRS-URD") for each user: (1) full name; (2) full residential address; (3) ten-digit telephone number assigned in the TRS numbering directory; (4) last four digits of the user's Social Security Number (or Tribal Identification Number); and (5) date of birth. In addition, Convo collects from each user a signed certification attesting that the user has a hearing or speech disability and understands that the cost of VRS is paid for by contributions from other telecommunications users to the TRS Fund. FCC TRS rules will require Convo to validate the eligibility of each call by querying the TRS-URD prior to the placement of a call, once the TRS Administrator notifies providers that it is ready for mandatory implementation of per-call validation.

Authentication For Calls that Originate on Convo Systems and Subject to STIR/SHAKEN



For point-to-point calls between VRS users, Convo inserts p-asserted identity in the SIP header in its originating SIP message (i.e. INVITE). The other end then checks that the INVITE has the p-asserted-identity. The p-asserted identity is a header field that is used among trusted SIP entities (typically intermediaries) to carry the identity of the user sending a SIP message. This header is entered into a call's user log and ultimately accessed by the terminating service provider and the Verification Service. For voice calls to hearing users, the TRS-URD user registration and validation requirements provide assurance to other providers that Convo knows the customer and that the customer has the right to use the associated telephone number. Convo has confirmed with/made arrangements with its underlying providers that such practices will enable the underlying provider to attach an A-level attestation into the SIP header for calls that originate on either company's system, and to transmit the call with authenticated caller identification information in the SIP header to the next provider in the call path.

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls

Acceptable Use Policies

A customer's use of Convo's service is subject to our terms of service, including the User Agreement and Privacy Policy. Convo prohibits customers from engaging or participating in communications of an abusive, harassing, fraudulent, or unlawful nature while using Convo's equipment, systems, or services. Convo reserves the right to terminate a user's service for violation of these prohibitions.

Monitoring Activities/Procedures for Identifying and Investigating Suspicious Activities

Convo monitors calling patterns to identify potentially suspicious activities. Convo's monitoring practices detect unusual calling patterns, e.g., calls of limited duration and in excess of a prescribed number. Convo set these parameters based on its analysis of user account settings, call activity, and telephone number verification. If calling activity triggers concern, Convo may disable a user's ability to make calls until an investigation is resolved.

Commitment of Cooperation to Respond to Traceback Requests and to Stop Illegal Robocallers & Commitment to Update Commission

Convo commits to taking all reasonable steps to avoid originating any illegal robocall traffic; responding within twenty-four (24) hours to all traceback requests received from the Commission, law enforcement, or the industry traceback consortium; and will cooperate with such entities in investigating and stopping any illegal robocallers that use their respective services to originate such calls.



This Robocall Mitigation Plan describes the specific measures that Convo has implemented as of the date of this submission. Convo continually evaluates the efficacy of their measures to combat bad actors and take appropriate steps to improve these measures when needed. Convo will update its Mitigation Plan accordingly in the event of revisions to the plan.