

Robocall Mitigation Plan

Business Information

IKB Networks LLC dba Netgrade
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Cinnaminson, NJ 08077

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, 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

IKB Networks LLC dba Netgrade ("Netgrade") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. Netgrade is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Netgrade was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as Netgrade now file RMPs. This document delineates Netgrade's RMP. Because Netgrade does not have access to the necessary infrastructure, it relies on its upstream carriers to assist in robocall mitigation.



As delineated herein, Netgrade works closely with its upstream providers 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 Netgrade in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

We offer only business VoIP services. Caller ID is configured by Netgrade during the account setup or customer onboarding process, and not the customer directly. The number is configured to match either the Direct Inward Dial number of the subscriber or the main number of the business, which is always a number on our upstream provider account.

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 17-5 9* (Rel. May 19, 2023) ¶¶ 49-51, Netgrade provides the following information concerning its upstream voice service carriers:

Telnyx, LLC
311 West Superior St
Suite 504
Chicago, IL 60654
+1.888.980.9750

Voyant Communications, LLC
550 W Adams Street
Suite 900
Chicago, IL 60661
+1.217.862.1953

To the extent that Netgrade 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 Netgrade’s agreements with its upstream providers contain no provisions specific to robocall mitigation, Netgrade has received assurances from those providers that they have and will continue to, sign calls transmitted to Netgrade, and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic.



Analytics for Monitoring Traffic

Netgrade works with its upstream providers to identify behaviors which indicate illegal call activity. Subscribers must specifically request the ability to place outbound calls and supply their use case before outbound dialing is enabled. Analytics reviews outbound call logs and analytics regularly to monitor for any possible abuse.

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

Plan Updates

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

I, Ian Brennan, Partner of IKB Networks LLC ("Netgrade"), do hereby certify, under penalty of perjury, the following:

- Netgrade, 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.
- Netgrade's business name and primary address are as follows:
 - IKB Networks LLC dba Netgrade
1 Sea Box Dr
Cinnaminson, NJ 08077
- Netgrade has no other business names in use.
- 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.
- Netgrade's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- The persons that have 10% or more ownership interest in Netgrade are: Ian Brennan & Katherine Brennan. Netgrade has no affiliates or subsidiaries.
- Netgrade has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- Netgrade is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- Netgrade is not required to, and does not have, an operating company number.

Ian Brennan
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