

Robocall Mitigation Plan

Business Information

Zen Communications, LLC
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San Francisco, CA 94104

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, outlines "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

Zen Communications, LLC ("Zen") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. Zen has fully implemented STIR/SHAKEN. In compliance with the R&O, Zen submits this RMP and certification.

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

Zen's KYC program involves obtaining specific subscriber information. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- email; and
- EIN.

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, Zen provides the following information concerning its upstream voice service carrier:

Bandwidth, Inc.
2230 Bandmate Way
Raleigh NC 27607
John Anthony
919-704-3069
jwanthony@bandwidth.com

Zen has no contractual provisions with its upstream carrier concerning robocall mitigation, but Zen and its upstream provider work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

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

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable law;
- violating applicable industry standards;
- using Zen's service to engage in or in connection with fraudulent activities;
- calls that are unlawful, harassing, libelous, invasive of another's privacy, abusive, threatening, obscene or that infringes the rights or intellectual property of others.

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

Analytics for Monitoring

Zen works with its underlying provider to detect a calling pattern consistent with illegal robocalls. If such a call is detected both parties will identify the party that is using Zen's network to originate those calls and will take appropriate action. Taking appropriate action may include, but is 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 our network.

No third-party vendors are associated with implementing or deploying Zen's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted, which follows the 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 or her particular use case and validate that the activity belongs to that subscriber.

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

Blocking

Zen will implement Do Not Originate requests it receives from the ITG. Zen has mechanisms to block suspicious calls using internal analytics. If Zen's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Zen will take appropriate action which may include suspending or terminating the subscriber's use of Zen's network. Zen will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorneys general offices) to 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 respond to the dynamic nature of mitigating illegal robocalling. Zen 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, Zen 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.

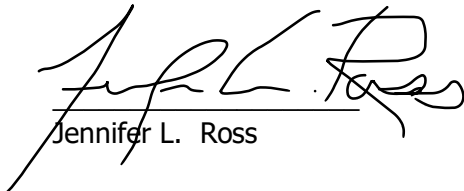
Certification of Jennifer Ross

I, Jennifer Ross, Client Support Specialist of Zen Communications, LLC ("Zen") do hereby certify, under penalty of perjury, the following:

- a. Zen has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. Zen's business name and primary address are as follows:

Zen Communications, LLC
548 Market Street
Suite 39254
San Francisco, CA 94104

- c. Zen has no other business names in use.
- d. Zen 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. Zen has one owner: The Riverside Company, which owns 100% of Zen. Zen has no affiliates or subsidiaries.
- g. Zen's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- h. Zen and its interest holder have not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Zen and its interest holder have not subject been to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Zen's Operator Code Number is 454K


Jennifer L. Ross