

Robocall Mitigation Plan

Business Information

Forefront Solutions, Inc.
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Clarksville, TN 37043

Contact Information

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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

Forefront Solutions, Inc. ("Forefront Solutions") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into its network.

As certified in the FCC's Robocall Mitigation Database, Forefront Solutions has fully implemented STIR/SHAKEN. In compliance with the R&O, Forefront Solutions submits this RMP and certification.

Know Your Customer ("KYC")

At the time this plan is filed, Forefront Solutions only provides voice services to the local small to medium businesses with whom Forefront Solutions already has a business relationship.

Forefront Solutions is a small company, we have a small number of customers. We know our customers and understand their use cases.

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

Forefront Solutions has one upstream provider from which it receives voice traffic:

Bandwidth, Inc
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
voicesecurity@bandwidth.com

Forefront Solutions has a master service agreement with its upstream provider and has received assurances in writing from its officials it has, and will continue to, sign calls transmitted to Forefront Solutions, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Forefront Solutions. Forefront Solutions and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Forefront Solutions maintains an AUP that subscribers must agree to before being permitted to use Forefront Solutions' software and services. Among other things, the AUP prohibits:

- using our service for any illegal purposes whatsoever;
- engaging in activity for which FCC or any equivalent national regulatory authority, has restricted or regulated in relation to proper use of the public telephony network or the Internet;
- using our service if Forefront Solutions determines, at its sole discretion, that its provision for this customer is prohibited by applicable law or has become impractical or unfeasible for any legal or regulatory reason; and
- using our service to offer or otherwise make available to others fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

Telephone Number Authorization

Forefront Solutions only allows customers to place outbound calls using Caller IDs they own through our upstream provider.

Analytics for Monitoring Traffic

Forefront Solutions works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our 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 involved in deploying Forefront Solutions' analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Forefront Solutions' 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.

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

Blocking

Forefront Solutions will promptly respond to Do Not Originate requests it receives from the ITG. Forefront Solutions has mechanisms to automatically block suspicious calls using internal analytics. If Forefront Solutions' monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Forefront Solutions will take appropriate action which may include suspending or terminating the subscriber's use of Forefront Solutions' network. Forefront Solutions will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and 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. Forefront Solutions 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, Forefront Solutions 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 David Robertson

I, David Robertson, Systems Integrator of Forefront Solutions, do hereby certify, under penalty of perjury, the following:

- (1) Forefront Solutions has partially implemented STIR/SHAKEN in the IP portions of its network.
- (1) Forefront Solutions' Business name and primary address are as follows:

Forefront Solutions, Inc.
688 Chesterfield Cir
Clarksville, TN 37043
- (2) Forefront Solutions has another business name in use: Oasis Physician Services.
- (3) Forefront Solutions has previously used the following business name: Thor Systems.
- (4) 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.
- (5) Forefront Solutions has the following principal: Kenneth J Robertson Jr. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) Forefront Solutions' role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (7) Forefront Solutions has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (8) Forefront Solutions is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (9) Forefront Solutions' Operator Code Number is 868K.

David Robertson _____

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