

Robocall Mitigation Plan

Business Information

Mosio, Inc.
8001 14th Ave NE, Suite A
Seattle, WA 98115

Contact for Robocall Mitigation Issues

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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

Mosio, Inc. ("Mosio") is a small VSP dedicated to stopping illegal calls from originating in our platform and monitoring the calls traversing our platform. As certified in the FCC's Robocall Mitigation Database, Mosio has fully implemented STIR/SHAKEN. In compliance with the R&O, Mosio submits this RMP and certification.

Note: Mosio primarily provides SMS services, and our platform can provide call forwarding capabilities when a call is placed to a "texting number" provisioned in our platform. There is no capability to dial outbound calls from within the Mosio platform from a phone number provisioned to Mosio from our upstream provider.

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, Mosio provides the following information concerning its upstream voice service carriers:

Bandwidth.com
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
(855) 864-7776
voicesecurity@bandwidth.com

Twilio Inc. ("Twilio")
101 Spear Street, 1st Floor
San Francisco California 94105
Melissa Blassingame, Director, Strategic Business Development
mblassingame@twilio.com
512-623-0512

Mosio follows procedures to ensure that it knows the identities of all its upstream carriers from which it accepts traffic. To the extent that Mosio was 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 Mosio's agreements with its upstream providers contain no provisions specific to robocall mitigation, Mosio has received assurances from them that they have and will continue to sign calls transmitted to Mosio, and they will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to you.

Know Your Customers

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

New Subscribers

Mosio's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s); and
- nature of the customer's business
- overview of intended use case for projects created within the Mosio platform

Acceptable Use Policy

Mosio maintains an Acceptable Use Policy ("AUP") that subscribers must sign during onboarding before being permitted to use Mosio's platform. The AUP is found at <https://www.mosio.com/tc>

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Mosio and obtained by Mosio from one of Mosio's underlying carriers for use by the subscriber. In all cases, Mosio directly manages the TNs used by its subscribers. Mosio tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Mosio's assignment of the TN to its subscriber.

Monitor Traffic with Analytics

Mosio provides reporting for call forwarding services. Note: Mosio primarily provides SMS services, our platform can provide call forwarding capabilities when a call is placed to a "texting number" provisioned in our platform. There is no capability to dial outbound calls from within the Mosio platform from a phone number provisioned to Mosio from our upstream provider.

Investigate Suspicious Activity

Note: Mosio primarily provides SMS services, our platform can provide call forwarding capabilities when a call is placed to a "texting number" provisioned in our platform. There is no capability to dial outbound calls from within the Mosio platform from a phone number provisioned to Mosio from our upstream provider.

Though not applicable to the Mosio platform (see note above for TN implementation in the Mosio platform), Mosio will follow Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Mosio will devote sufficient resources to provide prompt and complete resources to traceback requests. **Mosio certifies that it will comply with traceback requests within 24 hours of receiving same.**

Mosio will investigate suspicious activity found by its monitoring systems or reported to Mosio by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Mosio contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

Blocking

Mosio will implement Do Not Originate requests it receives from the ITG. Mosio has mechanisms to automatically block suspicious calls using internal analytics. If Mosio's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Mosio will take appropriate action which may include suspending or terminating the subscriber's use of Mosio's network. Mosio 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 & 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. Mosio 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, Mosio 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 Jay Sachdev

I, Jay Sachdev, Chief Technology Officer of Mosio, Inc. ("Mosio") do hereby certify, under penalty of perjury, the following:

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

Mosio, Inc.
8001 14th Ave NE, Suite A
Seattle, WA 98115
- c. Mosio has no other business names in use.
- d. Mosio 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. Mosio has one owner: Mosio, Inc.
- g. Mosio's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- h. Mosio has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Mosio has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.


Jay Sachdev (Feb 26, 2024 23:10 PST)

Jay Sachdev