

Robocall Mitigation Plan

Business Information

Quantum Services Group, LLC.
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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

Quantum Services Group, LLC ("QSG") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. QSG is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, QSG was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as QSG now file RMPs. This document delineates QSG's RMP. Because QSG does not have access to the necessary infrastructure, it relies on its upstream carriers to assist in robocall mitigation. As delineated herein, QSG 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 QSG in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

QSG's voice customers are largely connected to us via Fiber to their businesses. The few customers that are connected to us over the Internet are either branch offices of businesses connected to us via Fiber or are subscribers of several other services. Caller ID is configured by QSG internal resources and not the customer and are configured to either match the Direct Inward Dial number of the subscriber or the main number of the business.

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

Bandwidth.com
900 Main Campus Dr Suite 500
Raleigh NC 27606
John Anthony
jwanthony@bandwidth.com

Telnyx, LLC
311 West Superior St
Suite 504
Chicago IL 60654
+1 (888) 980-9750

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

Analytics for Monitoring Traffic

QSG 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 QSG's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, QSG works with its upstream providers to follow defined procedures on investigating such subscribers. QSG conducts investigations via Call Detail Records and our Call Analytics system.

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

Blocking

QSG will implement Do Not Originate requests it receives from the ITG. QSG's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If QSG and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, QSG will take appropriate action which may include suspending or terminating the subscriber's use of QSG's service. QSG will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, the FCC, and 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. QSG 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, QSG 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 Andrew Skandalaris

I, Andrew Skandalaris, Partner of Quantum Services Group, LLC. ("QSG"), do hereby certify, under penalty of perjury, the following:

- a. QSG, 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.
- b. QSG's business name and primary address are as follows:

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- c. QSG has no other business names in use.
- d. QSG has previously used a prior business name of "JW Tek".
- 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. QSG's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- g. The persons that have 10% or more ownership interest in QSG are: Eli Nakhleh and Andrew Skandalaris. QSG has no affiliates or subsidiaries.
- h. QSG has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. QSG is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. QSG is not required to, and does not have, an operating company number.

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