



## ENGUITY TECHNOLOGY CORP. Robo-Call Mitigation Plan

Enguity Technology Corp. ("Enguity") is a small interconnected VoIP carrier for which was eligible in prior for the STIR SHAKEN extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304 and a Non-IP based voice network exemption under 47 CFR § 64.6304(d). **Effective June 8, 2021, Enguity currently implements full STIR/SHAKEN attestation interconnection.**

Enguity has developed a Robo-Call Mitigation Plan to reduce robocalls and their harmful effects in accordance with the FCC's efforts to reduce or eliminate robocalls.

### Enguity's Network:

Enguity utilizes both packet-based, TDM and ipTDM based voice trunking infrastructure. All calls originating from or terminating into Enguity's network are processed and transported primarily by privately managed network infrastructure and/or are encrypted utilizing Xcorpeon ASIC (hardware based) Carrier Ethernet Transport systems.

### Enguity's Non-IP based Voice Network:

Voice calls that originate and/or terminate on Enguity's Non-IP based (TDM or ipTDM) voice network(s) rely upon technology that cannot initiate, maintain, carry, process, and/or terminate SIP calls are deemed subject to a continuing extension under 47 CFR § 64.6304(d).

As of the date of this filing, Enguity's Non-IP based interconnection partners currently implement STIR/SHAKEN *Out of Band Authentication* on Enguity's behalf for any voice calls that ultimately originate on our Non-IP based voice network, yet reach a digital SIP based trunk or IP based interconnection network by and through a 3<sup>rd</sup> party carrier.

Enguity is in the process of reducing its reliance upon legacy TDM based networks, *where possible*. See *Enguity's IP based Voice Network subsection below*.

### Enguity's IP based Voice Network:

In accordance with our prior commitment and as noted on our most recent Robocall Mitigation Plan Certification: **Effective June 8, 2021, Enguity currently implements full STIR/SHAKEN attestation interconnection for calls transiting our IP based Voice Network.**

Enguity is in the final stages of the remaining technical upgrades necessary to complete Enguity's direct and full STIR/SHAKEN implementation for Enguity's Non-IP Based Voice Network.

### ITC Traceback Cooperation:

Enguity commits to respond to all trace back requests from the FCC, law enforcement, the US Telecom Industry Traceback Group (ITG), and to cooperate with

such entities in investigating and ceasing any unlawful robocalls that may use its service to originate calls.

**Enguity's Traceback & Robocall history:**

As of the date of this filing, No such traceback requests have occurred, nor has any other carrier identified potentially malicious traffic originating, terminating and/or transiting Enguity's voice and/or data network(s).

**Enguity's Additional Information (FCC):**

As of the date of this filing, The filing entity has NOT, at any time in prior, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

**Enguity has taken the following specific steps to detect and prevent originating robocall traffic:**

Enguity limits the number of end-user facing voice trunk channels, SIP registrations and number of originating call appearances on a per TN, per customer basis. Further, SIP subscribers have the option to set outgoing call limits beyond those already set by Enguity on the number of simultaneous originating calls.

Enguity has developed a proprietary broad detection system in addition to utilizing industry standard practices, 3<sup>rd</sup> party database services and systems to raise network alarms based upon call thresholds and patterns of activity that are constantly monitored with log and call detail records reviewed and analyzed daily.

In addition to the above: Enguity has artificially rate-limited the number of calls per second each customer/end-user interface can originate at any given time, while also proactively monitoring our overall network for any excess call origination attempts.

**Enguity has at a minimum taken the following steps to prevent unlawfully originating robocalling traffic:**

Procedures and automated systems are in place to confirm the identity of new voice end-users by collecting and confirming information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of the end-users business.

Enguity goes well beyond industry standard practices, including but not limited to obtaining consumer and business credit profiles on any potential new business customer/entity, its owners, officers, and managers.

Enguity further requests criminal and civil background checks on any such potential new customer/entity, its owners, and shareholders.

Enguity's Terms of Service, Letter of Authorization and Acceptable Use Policies, have been updated to reflect our position and associated actions that will be taken upon receipt of unlawful voice traffic and/or robocalls.

Enguity shall send the required monthly reports to the Reassigned Number Database per the Second Report and Order on Advanced Methods to Target and Eliminate Unlawful Robocalls FCC-18-177A1.

**Enguity has taken the following steps to mitigate illegal originating robocalling traffic upon detection:**

Enguity may, at its discretion impose network-level constraints to include throttling the rate at which the end-user can initiate calls, potential suspension of all non-emergency (911) outbound calling services during investigation of reported robocalling and/or termination of service, at Enguity's discretion.

**Enguity's Relevant Network Assignments:**

RC MTG PLN CRT - DOC: 09/2021

RC MTG PLN CRT - DOI: 04/2024

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Prior RMD : RMD008025  
FCC FRN : 0023384621  
Business Name : Enguity Technology Corp.  
Business Address : 2020 Pennsylvania Ave. NW Suite #868  
Washington DC 20006

Foreign VSP : No (United States Domestic Only)  
OCN : 037G  
ACNA : LNY

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BGP ASN: [AS40911](#)

MAC OUI: 5C:4A:26 (Xcorpeon ASIC (hardware based) Carrier Ethernet Transport systems)

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IANA Service/Port Assignments (Xcorpeon ASIC (hardware based) Carrier Ethernet Transport systems):

| IANA Service Name               | Port No. | Protocol | Assignee | Reg. Date  |
|---------------------------------|----------|----------|----------|------------|
| <a href="#">enguity-xcceptp</a> | 8041     | tcp      | Enguity  | 2017-06-28 |
| <a href="#">enguity-xcceptp</a> | 8041     | udp      | Enguity  | 2017-06-28 |

**Network Traceback Requests:**

Carrier/Entity : Enguity Technology Corp.  
Network Operations: 888.695.5905  
Contact E-Mail : POC-AS40911@ENGUITY.COM

**Network Traceback - Exigent Circumstances Requests:**

