



August 6, 2025

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: ZP Better Together, LLC Robocall Mitigation Plan

Dear Ms. Dortch:

Pursuant to Section 64.6305 of the Commission's rules, ZP Better Together, LLC ("ZP") submits its Robocall Mitigation Plan to the Federal Communications Commission ("FCC" or "Commission").

ZP is an FCC-certified provider of video relay services ("VRS"). VRS is a video-call-based communications service in which a person who uses sign language connects with a communications assistant ("CA") via video. The CA then places a voice call to the intended recipient and interprets the conversation between the sign language user and the voice call recipient. ZP essentially serves as an intermediary between voice telephone users and users of video equipment who are deaf, deafblind or hard of hearing. ZP does not retain any call conversation except to produce a recorded video mail message left on user's endpoint under the FCC regulations.

ZP procures ten-digit North American Numbering Plan ("NANP") telephone numbers from local exchange carriers and assigns those numbers to its customers pursuant to Section 64.611 of the Commission's rules. The assigned telephone numbers are then uploaded into the Commission's Telecommunications Relay Service – User Registration Database ("TRS-URD"), as required by Section 64.615 of the Commission's rules.

STIR/SHAKEN Implementation Status

ZP is neither a telecommunications carrier nor a provider of private telecommunications, and thus does not submit, nor is it required to submit, a Form 499A to the FCC. ZP therefore is unable to obtain a Service Provider Code (SPC) token under the Governance Authority's revised SPC Token Access Policy. As a result, ZP is exempt from implementing STIR/SHAKEN at this time. Nevertheless, ZP has implemented the robocall mitigation plan described below.



Customer Vetting

Section 64.611 of the Commission’s rules requires ZP, as a VRS provider, to obtain and submit the following registration information to the TRS-URD for each user: (1) full name; (2) full residential address; (3) ten-digit telephone number assigned in the TRS numbering directory; (4) last four digits of the user’s Social Security Number (or Tribal Identification Number); and (5) date of birth. Before ZP can process each VRS call, ZP will be required to validate the eligibility of a caller’s ten-digit number by querying the status of such number the TRS-URD. ZP also process calls dialed around from TDNs that had been validated by the other VRS providers as they are subject to the same TRS-URD requirements under the Commission’s rules. Once the ten-digit number is validated as registered in the TRS-URD, the call may be completed. These TRS-URD registration and validation requirements give other carriers confidence that ZP knows a customer and a customer has the right to use the assigned telephone number.

ZP also engages in compliance checks where it reviews its internal database to validate the status of a customer’s identity and residency. Where certain indicators are present, ZP will investigate further, including by interviewing a customer.

Authentication

[****BEGIN CONFIDENTIAL INFORMATION****]

[****END CONFIDENTIAL INFORMATION****]

Monitoring and Investigation

[****BEGIN CONFIDENTIAL INFORMATION****]

[****END CONFIDENTIAL INFORMATION****]

Acceptable Use Policies

ZP’s customers must agree not to use the company’s services for, among other things, unlawful, harassing, or fraudulent purposes. ZP has the right to immediately discontinue service to any customer who does not comply with this agreement.

Commitment of Cooperation



ZP commits to respond fully and in a timely manner to all traceback requests received from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Commitment to Update Commission

ZP commits to update its filing with the Commission within ten business days of any changes to this Robocall Mitigation Plan.

Respectfully submitted,

/s/Gregory Hlibok

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