

800.com Robocall Mitigation Program Description

Filer: 800com, LLC | FRN: 0031443534 | Filed pursuant to 47 CFR § 64.6305

I. Introduction and Filer Overview

800com, LLC ("800.com") submits this Robocall Mitigation Program description in connection with its certification in the Federal Communications Commission's Robocall Mitigation Database ("RMD"), pursuant to 47 CFR § 64.6305.

800.com is a voice service provider that operates as a reseller of voice services. While 800.com's offering is predominantly oriented around toll-free numbering, 800.com also provides geographic (local) numbers to its customers. Its customers are predominantly U.S. businesses that use 800.com numbers for inbound call forwarding to their own established phone systems. 800.com does not operate as a gateway provider or as a non-gateway intermediate provider.

II. STIR/SHAKEN Implementation Status and Exemption

800.com selects **Option 3 — No STIR/SHAKEN Implementation**. Pursuant to **47 CFR § 64.6305(d)(2)(i)**, 800.com states that it is unable to implement STIR/SHAKEN because it lacks control over the network infrastructure necessary to implement STIR/SHAKEN. See First Caller ID Authentication Report and Order, 35 FCC Rcd 3241, 3260, ¶ 40 (2020) (recognizing that the STIR/SHAKEN implementation obligation does not apply to providers that lack control over the network infrastructure necessary to implement the framework); Eighth Caller ID Authentication Report and Order, FCC 24-120 (rel. Nov. 22, 2024).

Specifically:

- 800.com does not own, operate, or control the carrier network infrastructure, IP voice switching, SIP interconnection, STI-AS/STI-VS, certificate-management, SPC token, STI certificate, or SIP Identity-header signing systems necessary to perform STIR/SHAKEN authentication for calls associated with its service.
- 800.com is a reseller of voice services obtained from its underlying providers, primarily Bandwidth.com, Inc. ("Bandwidth"), with SignalWire, Inc. ("SignalWire") used for facsimile services and limited voice routing scenarios. The relevant network infrastructure is owned and operated by these underlying facilities-based providers.
- 800.com does not hold a Service Provider Code (SPC) token or STIR/SHAKEN digital certificate. Although 800.com holds an Operating Company Number (OCN), the OCN is an industry identifier and does not, in itself, confer control over the network infrastructure necessary to implement STIR/SHAKEN.
- 800.com is not technically positioned to perform STIR/SHAKEN authentication on calls associated with its service.

For traffic carried or originated through 800.com's underlying providers where STIR/SHAKEN authentication applies, Bandwidth and SignalWire — as the facilities-based providers with control over the relevant network infrastructure — perform STIR/SHAKEN authentication on that traffic

using their own SPC tokens and digital certificates, in accordance with each provider's standard attestation policy. Consistent with the Commission's discussion in the Eighth Caller ID Authentication Report and Order, FCC 24-120 (rel. Nov. 22, 2024), this arrangement is not "third-party authentication" for purposes of the Commission's rules; rather, each underlying provider signs calls associated with its reseller customer's traffic using its own certificate.

Because 800.com lacks control over the network infrastructure necessary to implement STIR/SHAKEN, it has no STIR/SHAKEN implementation obligation under the Commission's rules. 800.com nonetheless implements the robocall mitigation program described below, consistent with 47 CFR § 64.6305(a).

III. Principals, Affiliates, Subsidiaries, and Parent Companies

Pursuant to 47 CFR § 64.6305(d)(4) and the Commission's Robocall Mitigation Database Frequently Asked Questions, 800.com identifies the following individuals as principals of the filing entity:

- **Pete Petersen**, Chief Executive Officer
- **Ryan Nichols**, Chief Technology Officer

800.com has no affiliates, subsidiaries, or parent companies.

IV. Robocall Mitigation Program

A. Customer Focus and Business Model

800.com primarily serves business customers who use its toll-free and local numbers for inbound call forwarding to their own established phone systems. This focused, business-to-business model materially limits the risk of illegal robocall traffic originating in connection with 800.com's service relative to consumer-facing or high-volume outbound voice services.

B. Customer Screening and Fraud Prevention

Pursuant to 47 CFR § 64.1200(n)(4), 800.com implements risk-based customer screening and fraud-prevention procedures designed to limit the risk that illegal robocall or other prohibited traffic originates in connection with its service. These procedures include:

- **Risk-based signup screening**, including collection and validation of business and billing information and review of self-reported use case against 800.com's Acceptable Use Policy.
- **Automated fraud controls** at signup, including blocking of account creation through known VPN, proxy, and anonymizing IP infrastructure, and additional risk-signal-based controls intended to detect and deter fraudulent or automated account creation.
- **Enhanced verification for higher-risk services**. For services subject to elevated regulatory or industry-registration requirements (for example, A2P/10DLC text messaging), 800.com collects additional information from the customer, including business legal name and Employer Identification Number (EIN), and conducts enhanced verification consistent with applicable registration requirements.

- **Ongoing monitoring** for traffic patterns, complaints, traceback activity, or AUP violations inconsistent with the customer's stated use case.
- **Termination authority** to suspend or terminate any customer found to be engaged in illegal robocalling, illegal spoofing, or other prohibited activity.

800.com does not currently perform government-issued identity verification of all customers; its screening program is risk-based and oriented toward the use cases most relevant to its business customer base.

C. Caller ID Integrity

800.com prohibits its customers from using the service to originate calls with caller ID information intended to defraud, cause harm, or wrongfully obtain anything of value, consistent with the prohibitions in the Truth in Caller ID Act and 47 CFR § 64.1604. Customers are not permitted to specify or alter caller ID for outbound calls placed independently through the service.

In connection with 800.com's call-forwarding and simultaneous-ring functionalities, when an inbound call to a customer's 800.com number is forwarded or simultaneously rung to one or more customer-designated destinations (typically the customer's own home, office, or mobile numbers), 800.com may set the caller ID on those outbound forwarding legs to the original calling party's number, to a number identifying 800.com, or to a number identifying the customer's 800.com account. These outbound legs are not customer-initiated outbound calling campaigns; they are forwarding or routing legs associated with an inbound call placed by a third party to the customer's 800.com number, and the destinations are limited to those designated by the customer in advance. This use of caller ID is consistent with the legitimate call-forwarding and routing functions recognized under the Truth in Caller ID Act and the Commission's implementing rules.

D. Know-Your-Upstream-Provider

800.com obtains underlying voice and messaging services from U.S.-based facilities-based providers, primarily Bandwidth.com, Inc. for voice services, and SignalWire, Inc., which is used principally for facsimile services and for limited voice-routing scenarios where Bandwidth coverage or routing is unavailable or suboptimal. Both providers are registered in the Robocall Mitigation Database. 800.com maintains contractual relationships with each provider that include acceptable-use provisions and traceback cooperation requirements.

E. Analytics and Blocking

800.com relies on the analytics, authentication, and call-blocking capabilities of its underlying providers to identify and block suspected illegal traffic at the network level. 800.com does not currently engage a separate third-party analytics vendor.

V. Traceback Cooperation and 24-Hour Response Commitment

Pursuant to 47 CFR §§ 64.1200(n)(6) and 64.6305, 800.com commits to the following:

- Respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, federal and state law enforcement, and the registered industry traceback consortium (currently the Industry Traceback Group operated by USTelecom).

- Cooperate fully with such entities in investigating and stopping any illegal robocallers that use 800.com's service.
- Maintain a monitored Network Operations Center email address (noc@800.com) for receipt of traceback requests, AUP complaints, and abuse reports.
- Maintain internal escalation procedures and coordinate with the relevant underlying provider where a traceback involves traffic on that provider's network.

VI. Acceptable Use Policy Enforcement

800.com maintains procedures to address Acceptable Use Policy complaints raised by its underlying providers (Bandwidth and SignalWire) or other parties promptly, including suspension or termination of offending customers as warranted.

VII. Prior Enforcement Actions

800.com certifies that, at no time within the prior two years, has the filing entity (and/or any entity for which the filing entity shares common ownership, management, directors, or control) 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 entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

VIII. Contact Information

Robocall Mitigation Contact:

- Ryan Nichols, Chief Technology Officer
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- 5380 Gulf of Mexico Dr, Ste 105, Longboat Key, FL 34228-2048
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