

Robocall Mitigation Plan

Business Information

EARPING LLC
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Coconut Creek, FL 33073

Contact Information

Jonathan Wright
Chief Solutions Officer
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Overview

NON-RESPONSE EXPLANATION:

EarPing did not respond to the FCC Notice due to notification not being received via the email address therefore we were unaware the file needed to be updated. We have always complied with the regulations of the FCC and make every effort to make sure we are in compliance now and in the future.

In the Commission's recent 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 an 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

EARPING LLC ("EARPING") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

Know Your Customer ("KYC")

New EARPING subscribers must provide name, telephone number, email address, and country. Subscribers putting money onto the EARPING platform ("platform"), a requirement in order to place outbound PSTN calls, must also provide their credit card number and associated information.

New subscribers have their outbound calls rate-limited to one per second, and human contact via phone call or in-person is required in order to increase that rate. New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones validated through automated-number-validation voice call. All pay-by-card subscribers have limits placed on the number of payments they may make per day and the size of those payments. Both are kept low unless we have had human contact with the customer via phone call or in-person. Pay-by-invoice is allowed only for subscribers who we know well, with human contact via phone call or in-person at the very least, and credit and associated checks having taken place.

EARPING is a small VSP and has a small number of customers. We know our customers and understand their use cases.

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, EARPING provides the following information concerning its upstream voice service carrier.

EARPING has one upstream provider from which it receives voice traffic:

- 1) VOIP Innovations
One Penn Center West
Pittsburg, PA 15276
Anna Alvarez
aalvarez@sangoma.com

EARPING has received assurances in writing from VOIP Innovation officials that it has, and will continue to, sign calls transmitted to EARPING and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to EARPING. EARPING and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

EARPING maintains an AUP that subscribers must agree to before being permitted to use EARPING's software and services. Among other things, the AUP prohibits:

- using our service for any illegal purposes whatsoever;
- engaging in activity for which FCC or any equivalent national regulatory authority, has restricted or regulated in relation to proper use of the public telephony network or the Internet;
- using our service if EARPING determines, at its sole discretion, that its provision for this customer is prohibited by applicable law or has become impractical or unfeasible for any legal or regulatory reason; and

- using our service to offer or otherwise make available to others fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones verified through automated-number-validation voice call. Subscribers can sign a form allowing them to use Caller IDs not purchased through our platform or verified by validation call for outbound calls, functionality that is restricted to customers with whom we've had human contact by phone call or in-person. This form:

- prohibits the sending of outbound traffic via the PSTN with Caller IDs not owned by the customer or the customer's subscribers; and
- states that, if EARPING receives notice that the Customer's outbound calls through our platform are deemed to be spam, EARPING has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

EARPING works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

No third-party vendors are involved in deploying EARPING's analytics.

Investigate Suspicious Activity

We have implemented a robust monitoring system that automatically alerts the administrator when a specific caller ID exceeds a predetermined frequency threshold. This proactive measure ensures prompt detection and response to potential abuse or unusual activity patterns in our telecommunications network.

When traffic analysis indicates the presence of likely illegal robocalling, EARPING's risk prevention team is alerted, which follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

EARPING follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, EARPING will devote sufficient resources to provide prompt and complete resources to traceback requests. EARPING will respond to traceback requests within 24 hours of receiving same.

Blocking

EARPING will promptly respond to Do Not Originate requests it receives from ITG. EARPING has mechanisms to block suspicious calls using internal analytics. If EARPING's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, EARPING will take appropriate action, which may include suspending or terminating the subscriber's use of EARPING's network. EARPING 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 ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

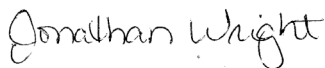
This plan, along with industry best practices, will evolve to respond to the dynamic nature of mitigating illegal robocalling. EARPING will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, EARPING 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 Jonathan Wright

I, Jonathan Wright, Head of Voice Services of EARPING LLC ("EARPING"), do hereby certify, under penalty of perjury, the following:

- (1) EARPING's Business name and primary address are as follows:
EARPING
6574 N State rd 7
Suite 182
Coconut Creek, FL 33073
- (2) EARPING has no other business names in use.
- (3) EARPING has not previously used any other business name.
- (4) 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.
- (5) The following persons/entities own more than 10% of EARPING each: EARPING and EARPING.
- (6) The following persons are EARPING's principals: EARPING and EARPING.
- (7) EARPING has the following affiliate: EARPING Solutions LLC. EARPING has no subsidiaries.
- (8) None of the persons/entities in items 5 – 7 above have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) EARPING's role in the call chain is that of a voice service provider that does not have a STIR/SHAKEN obligation due to lack of control over the infrastructure necessary to implement STIR/SHAKEN.
- (10) EARPING has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) EARPING is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) EARPING is not required to, nor does it have, an Operating Code Number.



Jonathan Wright