

Robocall Mitigation Plan

Business Information

US Directory Assistance, Inc. ("USDA")
200 Middle Hwy, #249
Barrington, RI 02806
FRN: 0023995700

Contact Information

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Overview

Pursuant to paragraphs 69-72 of the Federal Communications Commission's ("FCC," or "Commission") *Call Authentication Trust Anchor*, Sixth Report & Order and Further Notice of Proposed Rulemaking ("6th Report & Order") in WC Docket No. 17-97, FCC 23-18 (rel. March 17, 2023) and 47 C.F.R. §64.6304(d), USDA, which is a domestic small voice provider, has an indefinite extension from the requirement to be STIR/SHAKEN compliant.

The 6th Report & Order also states 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;
- 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.

Know Your Customer ("KYC")

USDA provides directory assistance services on a wholesale basis to telephone carriers ("carrier" or "carriers"). We process their subscribers' directory assistance inquiries. USDA is not in the business of originating voice calls. One hundred percent (100%) of the carrier traffic USDA handles is terminating traffic. Of this total, approximately eighty percent (80%) terminates via a peer-to-peer SIP connection directly between the carrier's Session Border Controller (SBC) and USDA's SBC. Hence, the public switched telephone network ("PSTN") is not involved in this component of the carrier-to-USDA call chain.

The other approximately twenty percent (20%) of carrier traffic terminates on the USDA network via a toll-free number, which USDA has assigned to them for this purpose. USDA maintains an inventory of toll-free numbers that we assign to carrier customers that opt to use this connection method in lieu of a peer-to-peer SIP connection. Unassigned toll-free numbers in our inventory are inactive and unreachable.

Because USDA is terminating calls originated by carrier customers utilizing toll-free access to our network, the carrier customer has the obligation to implement STIR/SHAKEN. USDA has communicated with all carrier customers regarding their obligation and all have assured USDA of their compliance with the Commission's STIR/SHAKEN and robocall mitigation rules.

For the USDA traffic that terminates on our service platform directly from the PSTN via toll-free service, the accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. USDA maintains a database of subscriber numbers associated with each carrier customer for the purpose of insuring that each carrier customer is billed only for directory assistance inquiries initiated by their subscribers.

USDA employs a Session Border Controller ("SBC") to terminate toll-free traffic from the PSTN. The SBC has the ability to block specific toll-free numbers and specific subscriber numbers. When unauthorized calling, including robocalling, is detected USDA has the ability to promptly block the offending subscriber number(s).

Know Your Upstream Providers

In accordance with the Commission's directive in Advanced Methods to Target and Eliminate Unlawful Robocalls and 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, FCC 23-37, (rel. May 19, 2023) ¶¶ 49-51, USDA provides the following information concerning its upstream voice service carrier.

USDA has one upstream provider from which it receives voice traffic directly:

Bandwidth.com
2300 Bandmate Way
Raleigh, NC 27607
voicesecurity@bandwidth.com

USDA has received assurances from its upstream provider's officials that it has, and will continue to, sign calls transmitted to USDA, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to USDA. USDA 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")

USDA's contracts include an AUP that carrier customers must agree to before being permitted to terminate calls to USDA's network. Among other things, the AUP prohibits:

- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using USDA's service to engage in or in connection with fraudulent activities.

USDA's contractual terms with subscribers specify that USDA may take action up to suspension or termination of service for violation of the AUP.

Analytics for Monitoring Traffic

USDA works with its upstream providers to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- calls from subscriber lines not associated with our carrier customers;
- velocity on initiate calls (synchronized intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- anomalies in call duration distribution (lots of very short or very long durations).

Investigate Suspicious Activity

USDA actively monitors incoming traffic to ensure we minimize the amount of traffic we cannot bill to one of our carrier customers. When traffic analysis indicates the presence of likely illegal robocalling, USDA immediately blocks the offending subscriber number(s) in our SBC. We then work with our upstream provider to follow defined procedures on investigating such subscriber numbers.

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;
- requesting upstream provider investigate issues with offending subscriber number(s).

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. USDA will monitor industry best practices and continuously improve our internal processes to ensure this plan and our systems adapt to this ever-changing issue.

In the event of any material change to this plan, USDA 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 David McGarty

I, David McGarty, President of US Directory Assistance, Inc., do hereby certify, under penalty of perjury, the following:

- (1) USDA, as a small voice provider, is exempt from the requirement to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) USDA's business name and primary address are as follows:

US Directory Assistance, Inc.
200 Middle Hwy, #249
Barrington, RI 02806
- (3) USDA has no other business names in use.
- (4) USDA was f/k/a as McGarty Communications Group, Inc. The corporate name was legally changed to US Directory Assistance, Inc. in 2010.
- (5) David McGarty, President, owns 100% of the stock of US Directory Assistance, Inc.
- (6) USDA does not own or have an interest in any subsidiaries or affiliates.
- (7) Neither USDA nor David McGarty have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (8) The name, title, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (9) USDA's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (10) USDA is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) USDA is not required to have and does not have an OCN

/s/ David McGarty

David McGarty, President

Dated: December 20, 2024