

Robocall Mitigation Plan

Business Information

Hiscall, Inc.
1001 Gentry Circle
Dickson, TN 37055

Contact Information

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Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (adopted March 16, 2023) 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 includes:

- "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.

Purpose

Hiscall, Inc. ("Hiscall") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. Hiscall is fully STIR/SHAKEN compliant.

Know Your Customer

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Hiscall in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Hiscall's KYC program involves obtaining specific subscriber information before allowing a potential subscriber to use our services. This process includes collecting such information as: (1) business location; (2) contact person(s); (3) nature of the entity's business; and (4) credit card information.

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, Hiscall provides the following information concerning its upstream voice service carriers.

Hiscall has two upstream providers from which it receives voice traffic:

- 1) Bandwidth Inc.
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Derek Hren
dhren@bandwidth.com
- 2) Telnyx, LLC
600 Congress Ave
14th Floor
Austin TX 78701
Mark Morse
mark@telnyx.com

Hiscall has master service agreements with its upstream providers and has received assurances from their officials it has, and will continue to, sign calls transmitted to Hiscall and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Hiscall. Hiscall and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Telephone Number Analytics

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Hiscall and/or obtained by Hiscall from one of Hiscall's underlying carriers for use by the subscriber. In most cases, Hiscall directly manages the TNs used by its subscribers. Hiscall tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Hiscall's assignment of the TN to its subscriber.

Analytics for Monitoring Traffic

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

- Anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Bandwidth and Telnyx are the third-party vendors that assist in deploying Hiscall's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Hiscall works with its upstream providers to follow 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 particular use case and validate that the activity belongs to that subscriber.

Hiscall follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback investigations. To allow for timely and comprehensive responses, Hiscall will devote sufficient resources to provide prompt and complete resources to traceback requests.

Hiscall certifies that it will respond to all traceback requests within 24 hours of receiving same.

Hiscall works with its upstream providers to investigate suspicious activity found by the carriers' monitoring systems or reported to Hiscall by subscribers or third parties. An investigation could potentially result in opening a traceback request or with Hiscall contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider(s) to block their use of the platform.

Hiscall requires our subscribers to cooperate in traceback investigations by, among other things, identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

Hiscall will implement Do Not Originate requests it receives from the ITG. Hiscall has mechanisms to automatically block suspicious calls using internal analytics. If Hiscall's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Hiscall will take appropriate action which may include suspending or terminating the subscriber's use of Hiscall's network. Hiscall reiterates that we will cooperate with Investigative Bodies to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

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

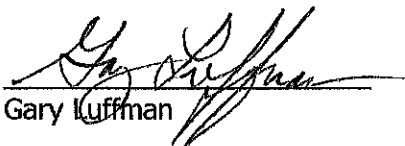
In the event of any material change to this plan, Hiscall will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Gary Luffman

I, Gary Luffman, President & CEO of Hiscall, Inc. ("Hiscall"), do hereby certify, under penalty of perjury, the following:

- (1) Hiscall is fully STIR/SHAKEN compliant.
- (2) Hiscall's business name and primary address are as follows:

Hiscall, Inc.
1001 Gentry Circle
Dickson, TN 37055
- (3) Hiscall has no d/b/a names.
- (4) Hiscall has not previously used any d/b/a names.
- (5) The following persons are Hiscall's principals and own more than 10% of Hiscall: Gary Luffman 51%; Sarah Luffman 49%.
- (6) Hiscall has two subsidiaries: Hiscall Technologies, Inc. and Hiscall Telecommunications, Inc.
- (7) Neither Hiscall nor any of the persons listed herein have been subject to an FCC enforcement proceeding or have been forbidden to file in the Robocall Mitigation Database.
- (8) 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.
- (9) Hiscall's role in the call chain is that of a voice service provider with a STIR/SHAKEN obligation.
- (10) Hiscall's OCN int 296L.


Gary Luffman