

Robocall Mitigation Plan

Business Information

NetOfficePBX LLC.
("NetOfficePBX")
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Contact Information

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Overview

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;
- 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

NetOfficePBX is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, NetOfficePBX has fully implemented STIR/SHAKEN. In compliance with the R&O, NetOfficePBX submits this RMP and certification.

Know Your Customer ("KYC")

NetOfficePBX is a small company, we have a small number of customers. We know our customers and understand their use cases.

When a customer signs up for service we gather the following information related to the Customer:

- Business Name
- Business Address
- Contact Name
- Contact Email Address

- Contact Phone Number
- Website
- IP Address they signed up from
- Valid Credit Card that matches the address and name of the person who is signing up
- Description of the type of outbound calls the customer will be placing. We do not accept calls that are placed through a Robo Dialer or outbound blast calling. All outbound calls must be dialed by a human and be for the normal course of legal business.

Customers sign up for service after vetting by a Sales Representative; during this process we communicate that, we require compliance with federal regulations regarding Know Your Customer (KYC) and STIR/SHAKEN, and the are required to signify acceptance of the afore mention by signing an addendum provided with a written estimate to move forward with an account before they can make or receive any calls on our network.

Without the customer explicitly accepting our Terms Of Service and entering their Charge Card information through our secure Portal we do not allow inbound or outbound calls from the customers on our platform.

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

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

Bandwidth.com
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
voicesecurity@bandwidth.com

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

Acceptable Use Policy ("AUP")

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

- 1) **Use with LCR:** Customer may not use the Service (as defined in the Terms and Conditions posted by NetOfficePBX from time to time at (<https://www.netofficepbx.com/tos>) with (or in connection with) a least cost router (or "LCR"), which NetOfficePBX will determine, in its reasonable discretion, based upon analysis of Customer's traffic patterns in the ordinary course of business.
- 2) **Use with Auto-Dialer (or "Robo-Dialer"):** Customer may not use the SIP Trunking Service with (or in connection with) an auto dialer (or "Robo-dialer"), which Provider will determine, in its reasonable discretion, based upon analysis of Customer's traffic patterns in the ordinary course of business.
- 3) **If using "North America Domestic Call Path Subscription" Voice Service, the following restrictions and limitations also apply:**
 - a. **Standard Business Use:** The Service is provided for Standard Business Use for a single company only. NetOfficePBX reserves the right to ensure that the Customer's use of the Service is consistent with Standard Business Use and otherwise complies with the Terms and Conditions. If NetOfficePBX determines that a Customer is not using the Service for Standard Business Use for a single company, NetOfficePBX may, in addition to all other rights and remedies pursuant to the Terms and Conditions, notify Customer and allow Customer the opportunity to cure any such use within two (2) calendar days. Customer may cure by stopping any such use, buying more trunks in order to comply with Standard Business Use, or change Customer's use of the Service in any other way that is consistent with Standard Business Use. Additionally, NetOfficePBX reserves the right to in any combination (i) immediately terminate the Service, (ii) charge a minimum inappropriate use fee of CA\$500.00 and/or charge CA\$0.05 per minute for all calls made during such periods of prohibited use (plus applicable toll free and international charges), whichever is higher, to Customer's payment method of record, and (iii) all applicable termination fees described in these Terms and Conditions.
 - b. **Not for Wholesale:** The North America Domestic Call Path Subscription service is not to be used with any type of Softswitch or Call Router with the intention of feeding phone service from a service provider to their customers using their own Softswitch or Call Router in a wholesale/resale environment. This service is to be registered to a single PBX/Phone System direct that belongs to a customer for their own internal use only. You are not to use any Trunking service for purchasing and porting the numbers out to another service provider. NetOfficePBX may determine, in its reasonable discretion, if Service is being purchased or used in violation of this provision, based upon analysis of Customer's traffic, purchase and cancellation patterns in the ordinary course of business. In addition to all other remedies that NetOfficePBX has listed as part of the

terms listed in this agreement, NetOfficePBX has the right to assess a Port Out fee of up to \$50.00 per phone number that is being ported out of an account that NetOfficePBX has reasonably determined is being used for the resale of phone numbers.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ported in, through the standard LNP process. That includes a copy of the most recent invoice provided by the losing carrier.

NetOfficePBX does not permit customers to send calls using Caller ID Name or Caller ID Number that does match the numbers or DIDs we have provisioned for them and are associated with there account with NetOfficePBX.

If NetOfficePBX receives notice that the Customer's outbound calls through our platform are deemed to be spam, NetOfficePBX has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

NetOfficePBX 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 NetOfficePBX's analytics.

Investigate Suspicious Activity

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

Blocking

NetOfficePBX will promptly respond to Do Not Originate requests it receives from the ITG.

NetOfficePBX 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 the ITG; as well as documenting requests and actions taken in response thereto.

NetOfficePBX blocks calls that exceed a certain number of calls per mins/sec from a customer and blocks calls that are not using an authorized caller ID.

NetOfficePBX has a database of DNO numbers and can in real time add numbers to it.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. NetOfficePBX 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, NetOfficePBX 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 Simon Aub

I, Simon Aub, the CTO of NetOfficePBX, do hereby certify, under penalty of perjury, the following:

1. NetOfficePBX has fully implemented STIR/SHAKEN in the IP portions of its network.
2. NetOfficePBX's Business name and primary address are as follows
NetOfficePBX LLC
321 Sheridan St. #205 Dania Beach FL 33004
3. NetOfficePBX has no other business names in use.
4. NetOfficePBX has not previously used any other business name.
5. 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.
6. NetOfficePBX LLC is solely and wholly owned by Simon Aub.
7. Simon Aub has never had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
8. NetOfficePBX's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
9. NetOfficePBX has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
10. NetOfficePBX is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.



Simon Aub