

Robocall Mitigation Plan

Business Information

smrtStudio, Inc.
651 N. Broad Street
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Middletown, DE 19709

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 (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, outlines "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 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

smrtStudio, Inc. ("smrtStudio") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. As certified in the FCC's Robocall Mitigation Database, smrtStudio has fully implemented STIR/SHAKEN. In compliance with the R&O, smrtStudio submits this RMP and certification.

Know Your Customer ("KYC")

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 smrtStudio in which we transmit, originate, and/or terminate calls based on behalf of the subscriber. smrtStudio's KYC program involves obtaining specific subscriber information when the subscriber is onboarded. This process includes collecting such information such as:

- Registered Company Name
- Registered Company Address
- Organization Type
- Vertical Sector
- Country of Registration
- EIN Number (A DUNS number can be provided as extra information)
- Website Address
- Up to 2 Registered Agents
- Nature of the customer's business

Acceptable Use Policy ("AUP")

smrtStudio maintains an AUP that subscribers must sign before being permitted to use smrtStudio's system. A link to the AUP is here: <https://www.smrtphone.io/terms-and-conditions/>

Know Your Upstream Provider

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, smrtStudio provides the following information concerning its upstream voice service carriers:

Telnyx, LLC
311 West Superior St
Suite 504
Chicago IL 60654
Sarah Halko
(312) 945-7420
regulatory@telnyx.com

Twilio Inc
101 Spear Street, 1st Floor
San Francisco CA 94105
Amy Holcroft
(415)295-4909
aholcroft@twilio.com

smrtStudio's agreements with its upstream providers contain no provision specific to robocall mitigation. smrtStudio has, however, received assurances from their upstream providers that they have, and will continue to, sign calls transmitted to smrtStudio, and will work closely with smrtStudio to mitigate illegal robocall traffic.

Monitor Traffic With Analytics

smrtStudio works with its upstream carriers to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. smrtStudio itself has internal compliance management procedures, a Compliance Taskforce, Phishing mitigation, National DNC List Scrubbing, and strong KYC procedures. If smrtStudio detects a calling pattern consistent with illegal robocalls, we will identify the party and will 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 system.

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

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, smrtStudio's technical operations 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.

smrtStudio is familiar with and uses best efforts to follow the Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, smrtStudio will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

smrtStudio will implement Do Not Originate requests it receives from the ITG. smrtStudio has procedures to block suspicious calls. If smrtStudio identifies suspected robocalling patterns that are confirmed with further investigation, smrtStudio will take appropriate action which may include suspending or terminating the subscriber's use of smrtStudio's system. smrtStudio will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, 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. smrtStudio 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, smrtStudio 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 Jordan Fleming

I, Jordan Fleming, CEO of smrtStudio, Inc. ("smrtStudio") do hereby certify, under penalty of perjury, the following:

- a. smrtStudio has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. smrtStudio's business name and primary address are as follows:

smrtStudio, Inc.
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- c. smrtStudio has no other business names in use.
- d. smrtStudio has not previously used any other business name.
- e. 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.
- f. The following people have 10% or more ownership in smrtStudio; smrtStudio has no parent companies, affiliates, or subsidiaries: Vlad Pustiu - 35%; Jordan Samuel Fleming - 30%; Alexandru Parge - 18 %; and Stefan Parge - 17%.
- g. smrtStudio's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- h. smrtStudio and its interest holder have not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. smrtStudio and its interest holders have not subject been to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. smrtStudio's Operator Code Number is 477K.



Jordan Fleming