

Robocall Mitigation Plan

Business Information

Thrio, Inc.
5320 Las Virgenes Road
Ste. 210
Calabasas, CA 91320

Contact Information

Rose M. Sinicrope
COO
858.299.7191
Rose.sinicrope@Thrio.com

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, 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;
- 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

Thrio, Inc. ("Thrio") is a VSP dedicated to stopping illegal calls from originating in our network. As certified in the FCC's Robocall Mitigation Database, Thrio has fully implemented STIR/SHAKEN. In compliance with the R&O, Thrio 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 Thrio in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Thrio's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);

- nature of the customer's business.

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, Thrio provides the following information concerning its upstream voice carriers.

Thrio receives voice traffic from the following upstream providers:

- 1) Twilio Inc. ("Twilio")
101 Spear Street, 1st Floor
San Francisco California 94105
Melissa Blassingame, Director, Strategic Business Development
mblassingame@twilio.com
512-623-0512
- 2) Telnyx, LLC ("Telnyx")
311 West Superior St
Suite 504
Chicago IL 60654
Sarah Halko, Director of Regulatory and Industry Affairs
regulatory@telnyx.com
312-945-7420
- 3) Belgacom International Carrier Services SA d/b/a BICS ("BICS")
Boulevard Roi Albert II 27, Belgium
Brussels, Belgium
Katia Gonzalez Gutierrez, Head of Fraud Operations and Fraud Services
lea@bics.com
+3225475184
- 4) Voyce Telecom LLC ("VoyceTel")
8200 Greensboro Dr.
Suite 820
McLean VA 22102
Omar Luna, CEO
omar.luna@voycetel.com
832-506-0905
- 5) Bandwidth Inc. ("Bandwidth")
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer, Senior Fraud Manager

voicesecurity@bandwidth.com
919-704-3069

- 6) Ytel, Inc. ("YTEL")
26632 Towne Centre Dr Suite 300
#300
Foothill Ranch CA 92610
Richard Kaplan
richard@ytel.com
800-382-4913
- 7) Versatel LLC ("Versatel")
1503 E. 19th St.
Edmond OK 73013
Alexandru Badulescu, Director of Telecom
alexandru.badulescu@46labs.com
5128313664

According to the Robocall Mitigation Database, Twilio, Telnyx, VoyceTel, Bandwidth, YTEL, and Versatel are fully STIR/SHAKEN compliant and, to the best of Thrio's knowledge, information, and belief, Twilio, Telnyx, VoyceTel, Bandwidth, YTEL, and Versatel have been, and will continue to, sign calls transmitted to Thrio, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Thrio.

According to the Robocall Mitigation Database, BICS partially implements STIR/SHAKEN by performing robocall mitigation. BICS commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls, and that some of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and the remainder of the voice traffic that originates on its network is subject to a robocall mitigation program.

Thrio 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")

Thrio maintains an AUP that subscribers must sign before being permitted to use Thrio's system. Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Thrio's service to engage in or in connection with fraudulent activities.

Thrio's contractual terms with subscribers specify that Thrio may act by suspending or terminating service for violation of the AUP.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify an outbound 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 Thrio and/or obtained by Thrio from one of Thrio's underlying carriers for use by the subscriber. In most cases, Thrio directly manages the TNs used by its subscribers. Thrio tracks these numbers in its inventory system and monitors the assignment of these numbers.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Thrio, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Thrio will attest calls originated with these TNs.

Analytics for Monitoring Traffic

Thrio works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Thrio or its carrier partners detect a calling pattern consistent with illegal robocalls, we will identify the party and take appropriate action. 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 Thrio's analytics for monitoring calls.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Thrio'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.

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

Blocking

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

I, Rose M. Sinicrope, Chief Operating Officer of Thrio, Inc. ("Thrio") do hereby certify, under penalty of perjury, the following:

- (1) Thrio's has fully implemented STIR/SHAKEN in the IP portions of its network.
- (2) Thrio's business name and primary address are as follows:

Thrio, Inc.
5320 Las Virgenes Road
Ste. 210
Calabasas, CA 91320

- (3) Thrio has no other business names in use.
- (4) Thrio has not previously used any other business name.
- (5) The following entity owns more than 10% of Thrio: Nextiva, Inc. It has not had its licensed denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) 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.
- (7) Thrio's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (8) Thrio has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) Thrio is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) Thrio's Operator Code Number is 435K.

DocuSigned by:

Rose M. Sinicrope

2F775F08D7A14E7...

Rose M. Sinicrope