

Robocall Mitigation Plan

Business Information

OneSource Telecom, Inc.
16238 Ranch Road, 620
Suite F-120
Austin, TX 78717

Contact Information

Darryl McCalmont
President
512.763.4600
darryl@onesourcetelecom.net

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

OneSource Telecom, Inc. ("OneSource") is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. OneSource is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, OneSource was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as OneSource now file RMPs. This document delineates OneSource's RMP. Because OneSource does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, OneSource works closely with its upstream provider to carry out the required mitigation functions.

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 OneSource in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

OneSource's KYC program involves obtaining specific subscriber information when the subscriber is onboarded. This process includes collecting such information such as:

- physical business location;
- contact person(s); and
- nature of the customer's business.

OneSource is a very small provider and knows every one of them personally. OneSource's customers do not have administrative access to its system. Moreover, customers are not allowed to change their outgoing caller ID number. In addition, OneSource only allows 15 simultaneous outgoing SIP calls on our system. Thus, it is impossible for them to spoof caller ID and originate illegal robocalls.

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

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

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

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

OneSource maintains an AUP that subscribers must sign before being permitted to use OneSource'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; and
- using OneSource's service to engage in or in connection with fraudulent activities.

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

Monitoring

OneSource analyzes high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If OneSource 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.

OneSource monitors its system for excessive trunk use. The system will email OneSource's support department if excessive trunk use is identified.

Investigate Suspicious Activity

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

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

Blocking

OneSource will implement Do Not Originate requests it receives from the ITG. OneSource has procedures to block suspicious calls. If OneSource identifies suspected robocalling patterns that are confirmed with further investigation, OneSource will take appropriate action which may include suspending or terminating the subscriber's use of OneSource's system. OneSource will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), to 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 in response to the dynamic nature of mitigating illegal robocalling. OneSource will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

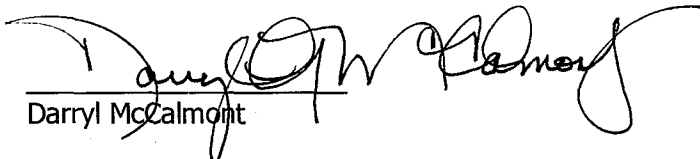
In the event of any material change to this plan, OneSource will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Darryl McCalmont

I, Darryl McCalmont, President of OneSource Telecom, Inc., do hereby certify, under penalty of perjury, the following:

- (1) OneSource, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) OneSource's Business name and primary address are as follows:

OneSource Telecom, Inc.
16238 Ranch Road, 620
Suite F-120
Austin, TX 78717
- (3) OneSource has no other business names in use.
- (4) OneSource has not previously used any other business name.
- (5) Darryl McCalmont is the owner of OneSource.
- (6) The following persons are OneSource's directors: Darryl McCalmont, Michelle McCalmont.
- (7) None of the persons in items 5 – 6 above have had their license denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (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) OneSource's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (10) OneSource has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) OneSource is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.


Darryl McCalmont