

Robocall Mitigation Plan

Business Information

YELTEK L.L.C.
4006 Al Hwy 157
Cullman AL 35058

Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (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;
- "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

YELTEK L.L.C. ("YELTEK") is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. YELTEK is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, YELTEK was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as YELTEK now file RMPs. This document delineates YELTEK's RMP. Because YELTEK does not have access to the necessary infrastructure, it relies on its upstream carriers to assist in robocall mitigation. As delineated herein, YELTEK works closely with its upstream providers 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 YELTEK in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

YELTEK'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, and 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, 38 FCC Rcd 5404 (2023), YELTEK provides the following information concerning its upstream voice service carriers.

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

1. RingLogix LLC D/B/A CarrierOfRecord.IO
7735 NW 146 St
STE 202
Miami Lakes FL 33016
Eduardo E. Maldonado, MBA
emaldonado@ringlogix.com
2. OIT, LLC
15450 New Barn Road
Suite 200 #1001
Miami Lakes FL 33014
Raymond G. Orsini, Jr.
compliance@oit.co

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

YELTEK maintains an AUP that subscribers must sign before being permitted to use YELTEK's network. 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 YELTEK's service to engage in or in connection with fraudulent activities.

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

Analytics for Monitoring Traffic

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

- 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).

Investigate Suspicious Activity

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

Because YELTEK does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in YELTEK's analytics.

YELTEK follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, YELTEK will devote sufficient resources to provide prompt and complete resources to traceback requests. YELTEK commits to respond within 24 hours to all traceback requests from the FCC, 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.

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

For all new and renegotiated YELTEK contracts governing the transport of voice calls, YELTEK will endeavor to contractually require YELTEK's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

YELTEK will implement Do Not Originate requests it receives from ITG. YELTEK's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If YELTEK and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, YELTEK will take appropriate action which may include suspending or terminating the subscriber's use of YELTEK's service. YELTEK 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), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

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

In the event of any material change to this plan, YELTEK 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 Joseph Heath Williams

I, Joseph Heath Williams, the Member of YELTEK, do hereby certify, under penalty of perjury, the following:

- (1) YELTEK, 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) YELTEK 's Business name and primary address are as follows:

YELTEK L.L.C.
4006 Al Hwy 157
Cullman AL 35058
- (3) YELTEK has no other business names in use.
- (4) YELTEK has not previously used any other business name.
- (5) The following individual owns more than 10% of YELTEK and exercises management and control over YELTEK: Joseph Heath Williams.
- (6) YELTEK previously had the following affiliate: H & A Technologies, LLC (it is now dissolved).
- (7) None of the persons/entities in items 5 – 6 above have had their licenses 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) YELTEK's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (10) YELTEK has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) YELTEK is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) YELTEK is not required to have, and does not have an operating company number.

Heath Williams

Joseph Heath Williams

Date: 04/15/2026