

Robocall Mitigation Plan for Pkosh Communications LLC

Introduction

Pkosh Communications LLC ("PCL"), is a voice service provider that originates voice traffic to the public switched telephone network (PSTN) and maintains a robocall mitigation program consistent with 47 CFR § 64.6305, including STIR/SHAKEN caller ID authentication implemented pursuant to 47 CFR § 64.6301(a). This document outlines PCL's comprehensive Robocall Mitigation Plan, ensuring full compliance with the FCC's amended requirements.

1. Contact Information

Pkosh Communications LLC: Pkosh Communications LLC

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Principals, Affiliates, Subsidiaries, and Parent Companies:

- Sam Schechter
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2. Provider Role/Call Flow

PCL provides retail VoIP/hosted PBX service to small business end users. Calls originate from Company-provisioned customer endpoints and route through Company-managed voice infrastructure to its upstream carrier for PSTN interconnection.

3. Implementation of STIR/SHAKEN Framework

PCL certifies that it has fully implemented the STIR/SHAKEN caller ID authentication framework (Complete Implementation) for calls it originates on its entirely IP-based network, consistent with 47 CFR § 64.6301(a). PCL signs outbound calls it originates using its own STI certificate issued by an approved STI Certificate Authority (STI-CA) through in-house signing technology. PCL assigns attestation based on verification of the originating party and confirmation of that party's authority to use the calling number(s), consistent with applicable FCC rules, orders, and guidance; for example, calls using telephone numbers assigned to PCL by its underlying provider(s) and provisioned to verified customers are signed with A attestation, as appropriate. PCL further certifies that no prior certification has been removed by Commission action.

4. Robocall Monitoring and Mitigation

PCL actively works to prevent illegal robocalls from originating or transiting through its network. Our approach includes:

- **Traffic Monitoring:**
 - PCL monitors detail and usage patterns for anomalies (e.g., high-volume bursts, short-duration calling, repetitive dialing to common destinations) and promptly investigating indicators of suspicious activity
- **Customer Vetting:**
 - During onboarding, PCL collects and verifies business identity information (e.g., legal business name, address, responsible party, and service location details) and validates that the customer is a legitimate operating business before enabling outbound calling. If onboarding information is inconsistent, unverifiable, or suggests elevated risk, PCL delays activation pending enhanced review and/or declines service.
 - PCL ensures that customers agree to terms prohibiting illegal robocalling.
- **Complaint Resolution:**
 - PCL provides a clear process for individuals to report suspected robocalls.
 - PCL investigates complaints and takes corrective actions, including termination of services for violators.

5. Call Analytics and Upstream Provider Procedures

- **Call Analytics:**
 - PCL employs third-party call analytics systems provided by underlying carriers to detect and mitigate suspected illegal robocall traffic, as PCL is a small provider and does not have the need to maintain their own Class 4 switch platform or least cost routing.
 - These systems analyze call patterns in real-time to identify potential violations.
- **Upstream Provider Procedures:**
 - PCL ensures that all upstream providers comply with FCC regulations and maintain updated RMD certifications.
 - Periodic reviews of upstream providers' practices are conducted to verify compliance.

6. Compliance with FCC Requirements

PCL complies with all FCC rules and regulations regarding robocall mitigation, including:

- Filing certification and supporting documentation in the FCC's Robocall Mitigation Database (RMD).
 - Updating its RMD filing and associated plan information within 10 business days when filing information changes.
 - Ensuring that all required information, including our role in the call chain and details of STIR/SHAKEN implementation, is provided and updated promptly.
 - Affirming that neither PCL nor any affiliated entity has been subject to Commission or law enforcement action related to illegal robocalling, spoofing, or RMD certification deficiencies in the past two years.
 - Committing to respond fully to traceback requests within 24 hours when emailed by the US Telecom ITG (Industry Traceback group).
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7. Future Enhancements

PCL is committed to improving its robocall mitigation efforts over time. Planned enhancements include:

- Deploying advanced analytics tools to identify and block suspicious traffic more effectively.
 - Expanding customer education programs to raise awareness about robocalls and how to report them.
 - Strengthening partnerships with industry organizations and regulators to stay ahead of emerging robocall trends.
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8. Commitment to Correct Deficiencies

PCL will respond promptly to any FCC notice of deficiency in its RMD certification. This includes:

- Updating RMD certifications and robocall mitigation plans to cure identified deficiencies.
 - Providing detailed explanations to the FCC regarding corrective actions taken.
 - Ensuring compliance within the specified timeframe to avoid removal from the RMD.
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Conclusion

Pkosh Communications LLC is dedicated to protecting its customers and the public from the harm caused by illegal robocalls. Through PCL robust partnerships, compliance with FCC regulations, and continuous improvement, PCL ensures a secure and reliable voice service for its customers.