

Robocall Mitigation Plan

Business Information

Dagobah Systems Inc.
651 N. Broad Street
Ste. 206,
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" procedures;
- 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 an 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

Dagobah Systems Inc. ("DSI") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. In compliance with the R&O, DSI 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 DSI in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

DSI's KYC program involves obtaining specific subscriber information before the prospective customer can commence service. This process includes collecting information such as:

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

Acceptable Use Policy ("AUP")

DSI maintains an AUP that subscribers must agree to before being permitted to use its service. DSI's AUP may be found here: <https://telcobillcenter.com/tos>

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, DSI provides the following information concerning its upstream voice service carrier:

QuestBlue Systems, Inc.
1947 Evans Rd
Cary NC 27513
Kevin Masse
919-443-1617
carriersupport@questblue.com

Bandwidth, Inc.
2230 Bandmate Way,
Raleigh, NC 27607
Stephen Thayer
919-704-3069
voicsecurity@bandwidth.com

Sinch America, Inc.
7000 Central Parkway
Suite 1480
Atlanta GA 30328
Stacy Graham
217-862-1953
stacy.graham@sinch.com

DSI and its upstream providers have agreed to work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Monitoring With Analytics

DSI works with its upstream carriers to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If DSI detects a calling pattern consistent with illegal robocalls, we will identify the party and will take 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.

There are no third-party vendors involved in deploying DSI's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, DSI follows certain 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 unusual 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.

DSI follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, DSI devotes sufficient resources to provide prompt and complete resources to traceback requests. DSI will respond to traceback requests within 24 hours of being notified of same.

Blocking

DSI will implement Do Not Originate requests it receives from the ITG. DSI works with its upstream carriers to block suspicious calls. If DSI and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, DSI will take appropriate action which may include suspending or terminating the subscriber's use of DSI's network. DSI will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), and the FCC, the ITG, as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. DSI 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, DSI 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 Jake Jacoby

I, Jake Jacoby, Chief Executive Officer of Dagobah Systems, Inc. ("DSI") do hereby certify, under penalty of perjury, the following:

- a. DSI's business name and primary address are as follows:

Dagobah Systems Inc.
651 N. Broad Street
Ste. 206,
Middletown DE 19709

- b. DSI's d/b/a names are TELCLOUD and TBC Communications.
c. Except as listed above, DSI has not previously used any other business names.
d. 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.
e. The following person owns 10% or more of DSI: Jake Jacoby. Mr. Jacoby is DSI's sole principal. DSI has no affiliates or subsidiaries.
f. DSI's role in the call chain is that of a voice service provider that does not have a STIR/SHAKEN obligation.
g. DSI is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
h. DSI has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
i. DSI is not required to, nor does it have, an Operator Code Number.

DocuSigned by:

Derek "Jake" Jacoby

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Jake Jacoby