

magicJack LP

Robocall Mitigation Plan

Document Control

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Document Revisions

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Summary

Public Notice DA 24-73, released January 25, 2024, announces effective dates and compliance deadlines for revised Robocall Mitigation Database filing requirements and related rules adopted in the Sixth Caller ID Authentication Report and Order, including the additions of and revisions to 47 CFR §§ 64.6303(c), 64.6305(d), 64.6305(e), 64.6305(f) and 64.6305(g).¹

Pursuant to these rules, all providers, regardless of whether they are required to implement STIR/SHAKEN—including all intermediate providers and providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN—are now required to file certifications and robocall mitigation plans to the Robocall Mitigation Database. They must also comply with expanded disclosure requirements for these submissions. Providers newly required to file in the Robocall Mitigation Database must submit their initial filings containing all required information and certifications by February 26, 2024.

Purpose

magicJack LP ("MJLP") is a Voice Service Provider dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. MJLP utilizes its affiliate Ymax's infrastructure which has a fully implemented STIR/SHAKEN program. MJLP is not a foreign voice service provider.

This document delineates MJLP Robocall Mitigation Plan.

Know Your Customer

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 MJLP in which we send calls on behalf of the subscriber to other voice service providers. All new subscribers have their identity confirmed by MJLP by verifying the subscriber's name, email address, ensuring the validity and location of the email address.

Know Your Upstream Provider

MJLP has a single upstream provider to facilitate all voice traffic originating on or terminating to our subscribers. The relationship with this established voice provider involves strong contractual terms.

¹ *In the Matter of Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (2023) (*Sixth Report and Order*).

Subscriber Agreement

MJLP maintains a Subscriber Agreement (“SAPS”) that subscribers must agree to before being permitted to use MJLP service over the YMax's network.² Among other things, this SAPS prohibits customers from:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- engaging in “autodialing” and/or “telemarketing”;
- engaging in abusive or unsolicited communications, or any other mass, automated voice communications for commercial or marketing purposes
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using MJLP service to engage in or in connection with fraudulent activities.

MJLP SAPS specifies that MJLP may act immediately with or without notice, at its sole discretion, if believes the customer violated restrictions contained in the SAPS.

Mitigation During Service

MJLP works to ensure that they report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers.

Analytics for Monitoring Traffic

MJLP works to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- volume of outbound calls and average durations; and
- anomalies in call duration distribution

Investigate Suspicious Activity

MJLP maintains a fraud team dedicated to monitoring and analyzing traffic patterns and information available to ensure suspicious activity reviewed and appropriate action taken. The upstream provider is a Supporting Partner of the Industry Traceback Group.

When traffic analysis indicates suspicious activity, MJLP has 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;
- contacting the subscriber to understand their particular use case and validate that the activity belongs to that subscriber.

² magicJack Subscriber Agreement,
https://help.magicjack.com/faq/saps/?_ga=2.268676088.862720195.1708829957-2022777834.1690204086

No third-party vendors are involved in MJLP analytics. MJLP commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Suspicious Activity Resolution

If MJLP identifies suspected robocalling patterns that are confirmed with further investigation, MJLP will take appropriate action which may include suspending or terminating the subscriber's use of MJLP service.

The name, title, department, business address, telephone number, and email address of the person within MJLP responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the traceback consortium, and law enforcement agencies, is as follows:

Contact Name: Stephan O'Rourke

Contact Title: Fraud Team

Contact Street: 931 Village Blvd., Suite 905, Box 386

Contact City: West Palm Beach

Contact State and Zip Code: FL 33409

Contact Telephone Number: 561-290-6001

Contact Email: reportabuse@magicJack.com

Plan Updates

MJLP monitors industry best practices and its existing internal processes and may revise this plan where necessary. In the event of any material change to this plan, MJLP 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 Steven Sabados

I, Steven Sabados, Chief Information Security Officer of magicJack LP, do hereby certify, under penalty of perjury, the following:

- (1) magicJack LP ("MJLP"), by virtue of its status as a 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) MJLP Business name and primary address are as follows:

magicJack LP.
931 Village Blvd. Suite 905, Box 386
West Palm Beach, FL 33409

- (3) MJLP has no other business names in use.
 - (4) MJLP role in the call chain is that of a voice service provider that utilizes its affiliate Ymax's infrastructure which has a fully implemented STIR/SHAKEN program.
 - (5) All calls MJLP originate on its network in its capacity as a reseller, are subject to this Robocall Mitigation Plan.
 - (6) At no time in the prior two years, has MJLP been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to MJLP transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.
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