

Robocall Mitigation Plan

Business Information

Encore Technology Group, LLC
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Contact Information

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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, 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;
- 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

Encore Technology Group, LLC ("ENCORE") is a VSP dedicated to stopping illegal calls from originating in our network. As certified in the FCC's Robocall Mitigation Database, ENCORE has fully implemented STIR/SHAKEN. In compliance with the R&O, ENCORE 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 ENCORE in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

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

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

- (1) Bandwidth Inc. ("Bandwidth")
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
voicesecurity@bandwidth.com
- (2) VoIP Innovations, LLC ("VoIP Innovations")
One Penn Center West
Suite 400
Pittsburgh PA 15276
Cameron Nutter
cnutter@sangoma.com

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

ENCORE maintains an AUP that subscribers must sign before being permitted to use ENCORE'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 law;
- violating applicable industry accepted guidelines; and
- using ENCORE's service to engage in or in connection with fraudulent activities.

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

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify an outbound caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by ENCORE and/or obtained by ENCORE from one of ENCORE's underlying carriers for use by the

subscriber. In most cases, ENCORE directly manages the TNs used by its subscribers. ENCORE tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of ENCORE's assignment of the TN to its subscriber.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by ENCORE, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, ENCORE will attest calls originated with these TNs.

When originating a call, ENCORE checks the calling party number against ENCORE's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Analytics for Monitoring Traffic

ENCORE works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls 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 network.

No third-party vendors are involved in deploying ENCORE's analytics.

Investigate Suspicious Activity

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

ENCORE follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, ENCORE will devote sufficient resources to provide prompt and complete resources to traceback requests. ENCORE certifies that it will respond to all traceback requests within 24 hours of receiving same.

Blocking

ENCORE will promptly respond to Do Not Originate requests it receives from the ITG. ENCORE has mechanisms to automatically block suspicious calls using internal analytics. If ENCORE's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, ENCORE will take appropriate action which may include suspending or terminating the subscriber's use of ENCORE's network. ENCORE will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. ENCORE 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, ENCORE 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.

ENCORE has reviewed this plan and the accompanying filing and recertifies as to its accuracy and completeness.

Certification of Russell Young

I, Russell Young, Chief Financial Officer of Encore Technology Group, LLC ("ENCORE") do hereby certify, under penalty of perjury, the following:

- (1) ENCORE has fully implemented STIR/SHAKEN in the IP portions of its network.
- (2) ENCORE's business name and primary address are as follows:

Encore Technology Group, LLC
141 Grace Drive
Easley, SC 29640

- (3) ENCORE has no other business names in use.
- (4) ENCORE has not previously used any other business name.
- (5) The following person owns more than 10% of ENCORE: Todd Newnam.
- (6) The following persons are ENCORE's officers/directors: Todd Newnam, Russell Young, Mike Harris.
- (7) None of the persons/entities 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) ENCORE's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (10) ENCORE has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) ENCORE is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) ENCORE's Operator Code Number is 151K.

/s/Russell Young