

Robocall Mitigation Plan

Business Information

ODN, Inc.
4451 I-70 DR NW
Columbia MO 65202

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"), including those that are fully STIR/SHAKEN compliant, 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

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

All ODN's subscribers are required to provide account information when signing up for services, including name, location, email address, payment method, etc. Acquiring a VoIP account through ODN requires VoIP hardware that is supplied, programmed, and typically delivered or installed by ODN employees. This serves to verify the information submitted by the subscriber.

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

ODN has one upstream provider from which it receives voice traffic:

Bandwidth Inc.
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
(855) 864-7776
voicsecurity@bandwidth.com

ODN has a master service agreement with its upstream provider and has received assurances in writing from its officials it has, and will continue to, sign calls transmitted to ODN, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to ODN. ODN and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

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

ODN's contractual terms with subscribers specify that ODN 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 ODN and/or obtained by ODN from one of ODN's underlying carriers for use by the subscriber. In most cases, ODN directly manages the TNs used by its subscribers. ODN tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of ODN'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 ODN, 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, ODN will attest calls originated with these TNs.

When originating a call, ODN checks the calling party number against ODN'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

ODN 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 ODN's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, ODN's 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.

ODN follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, ODN will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

ODN will promptly respond to Do Not Originate requests it receives from the ITG. ODN has mechanisms to automatically block suspicious calls using internal analytics. If ODN's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, ODN will take appropriate action which may include suspending or terminating the subscriber's use of ODN's network. ODN 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. ODN 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, ODN 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 Paulette Allen

I, Paulette Allen, Operations Manager of ODN, Inc. ("ODN") do hereby certify, under penalty of perjury, the following:

- (1) ODN's role in the call chain is a carrier who has STIR/SHAKEN requirements; ODN has fully implemented STIR/SHAKEN.
- (2) ODN's business name and primary address are as follows:

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- (3) ODN has no other business names in use.
- (4) ODN has not previously used any other business name.
- (5) ODN's owner and CEO is Gregory F. Heifner. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) 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.
- (7) ODN's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (8) ODN has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) ODN is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) ODN's Operator Code Number is 390K.

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