

Robocall Mitigation Plan

Business Information

QoS Communications LLC
530 N Black Horse Pike
Blackwood NJ 08012

Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "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";
- 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 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

QoS Communications LLC ("QoS") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into its network. QoS is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, QoS was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as QoS now file RMPs. This document delineates QoS's RMP. Because QoS does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, QoS works closely with its upstream provider to carry out the required mitigation functions.

Know Your Customer ("KYC")

All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Human contact via phone call or in-person is required in order for new subscribers to gain access to the QoS platform ("platform") to make outbound calls. Subscribers deposit money into the platform

via pay by invoice, which is a requirement before a subscriber can place outbound PSTN calls. A subscriber must provide payment through one of the following methods:

1. online via our payment site.
2. through autopay by filling out our ACH form and providing the required information.

QoS is a small company, and we have a small number of customers. As a result, We know our customers and understand their use cases.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls*, and *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, 38 FCC Rcd 5404 (2023), at ¶¶ 49-51, QoS provides the following information concerning its upstream voice service carrier.

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

CoreDial LLC
51 Arbor Way, Ste. 150
Blue Bell PA 19422
cdsupport@skyswitch.com

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

Acceptable Use Policy ("AUP")

QoS maintains an AUP that subscribers must agree to before being permitted to use QoS' software and services. Among other things, the AUP prohibits:

- using our service for any illegal purposes whatsoever;
- engaging in activity for which FCC or any equivalent national regulatory authority, has restricted or regulated in relation to proper use of the public telephone network or the Internet;
- using our service if QoS determines, in its sole discretion, that provision for a customer is prohibited by applicable law or is impractical or unfeasible for any legal or regulatory reason; and
- using our service to offer, or otherwise make available to others, fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform, which we obtain from CoreDial.

Analytics for Monitoring Traffic

The Company, through its network provider, uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer ("KYC") requirement to access the Company's networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.

QoS's analytics are performed by CoreDial/Skyswitch.

Investigate Suspicious Activity

The Company, through CoreDial, utilizes a combination of internal tools and third-party solutions to check for Do Not Originate ("DNO") numbers. In addition, the Company utilizes a similar combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

QoS is in the process of determining how it can effectively and efficiently implement appropriate Industry Traceback Group ("ITG")-recommended best industry practices and directly respond to timely traceback requests. It is QoS' understanding that its physical carrier, CoreDial, has adopted proper ITG best practices and responds appropriately to traceback requests, including requests related to QoS traffic.

Blocking

QoS will promptly respond to Do Not Originate requests it receives from ITG. As explained herein, QoS uses CoreDial/Skyswitch to identify and block bad and suspicious traffic as appropriate. QoS takes appropriate action which may include suspending or terminating the subscriber's improper use of QoS's network. QoS 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 ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

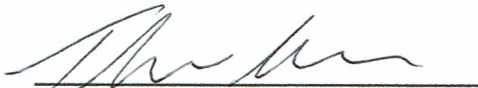
This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. QoS will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, QoS 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 Thomas Greeno

I, Thomas Greeno, President of QoS, do hereby certify, under penalty of perjury, the following:

- (1) QoS has fully implemented STIR/SHAKEN in the IP portions of its network.
- (2) QoS's Business name and primary address are as follows: QoS Communications LLC 530 N Black Horse Pike Blackwood NJ 08012
- (3) QoS has no other business names in use.
- (4) QoS has not previously used any other business name.
- (5) 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.
- (6) Thomas Greeno is the sole owner of QoS
- (7) Thomas Greeno exercises management and control over QoS.
- (8) QoS has no subsidiaries/affiliates.
- (9) The person/entity in items 5 – 7 above has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (10) QoS's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (11) QoS has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (12) QoS is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (13) QoS's Operating Company Number is 832055. RMD0010735



Thomas Greeno

Dated: 12/23/2024