

Robocall Mitigation Plan

ETB Services, Inc.
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610-409-0395
FCC registration Number 0027674704

Erik T. Barnshaw, President and Principal of ETB Services, Inc.
No affiliates; No subsidiaries; No parent company.

Know Your Upstream Vendor

ETB Services, Inc. uses White Label Communication, LLC (WLC) as its sole upstream provider of telephone services, with which it has a Master Service Agreement. ETB Services, Inc and WLC extend assurances delineated in WLC agreements with its vendors, providing assurances that all calls submitted through WLC are signed, and to abide by STIR/SHAKEN and Robocall mitigation requirements that ETB Services, Inc., through its customers, shall not use WLC's network to originate illegal traffic.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

ETB Services Inc. knows its customers well through the provision and delivery of highly customized complete 24-7 IT services. VoIP services are not offered to customers except as an add-on service to the managed IT services. Thus, ETB is assured an in-depth understanding of the each VoIP customer's telecommunication requirements and usage.

ETB follows Principal #5, Confirm the Identify of Commercial Customers, (State Attorneys General Anti-Robocall Principles for Voice Service Providers, Aug. 22, 2019), and for each customer knows their physical location, and the nature of each customer's business. Customer State of incorporation, federal tax ID # are available.

Traceback

Within 24 hours, ETB Services shall respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. All traceback requests should be directed to ETB Support @ 610-409-0395 x1.

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Robocall Mitigation Program

We use software & services provided by White Label Communications LLC to monitor our outbound voice traffic in real-time to prevent the origination of illegal robocalls. Combining behavioral analytics, caller authentication and verification, our solution features:

- No Outbound calls can show an outbound caller ID that differs from a phone number owned by the Customer.
- No excessive Dialing or short Dialing (less than 6 second) is allowed.
- No outbound Auto Dialers can be used without programming done by an ETB Services, Inc. Employee.
- Any traceback requests from the FCC, law enforcement, or the industry traceback consortium will have full cooperation from ETB Services, Inc. to stop or investigate illegal robocallers.
- Call Blocking Support: Accurate identification enabling subscribers to block fraudulent phone calls as per the TRACED Act (2019)
- Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with an override to include original caller ID even when a call is determined fraudulent.

In addition, we have implemented a Call Abuse Policy and have published the following policy to our website, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the ETB Services, Inc. network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the ETB Services, Inc. network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”

Call Analytics:

ETB Services tracks both incoming and outgoing calls for Robocall activity generating:

1. Average device call counts – to monitor unusually high call count volumes.
2. Studies of “Short Calls” (calls that are less than 6 seconds in duration, with no other calls made from the same phone number), which ETB deems as possible candidate robocalls. Metrics: in total and by Account, Hangup Cause, or Area Code – used to isolate possible robocall activity.

Data are call data, a randomly selected week’s activity, obtained from White Label Communications database. Call record data fields include: Call Date/Time, Direction, Account, # From, # To, Duration, Hangup Cause, Caller ID Name, Caller ID Number, Callee

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ID Number, Billed Seconds. To anonymize analyzed data, an Account index is substituted for Account name, Caller ID name is dropped.

White Label Communications is ETB Services' upstream VoIP partner.

Know Your Up-Stream Provider:

As ETB Services' VoIP streaming partner, White Label Communications ("WLC") provides ETB with a comprehensive set of policies, on-line tools to limit unwanted robocall activity. WLC staff are readily available to help investigate robocall activity.

International Calls:

ETB Services monitors international calling patterns to eliminate as much as possible robocall activity originating outside the United States.