

Robocall Mitigation Plan for zPaper, Inc.

Introduction

zPaper, Inc. ("ZPI"), a healthcare organization for document exchange and is committed to mitigating unlawful robocalls and complying with Federal Communications Commission (FCC) regulations. As a small provider, ZPI relies on any underlying providers for call termination services, DID origination services, and STIR/SHAKEN attestation. This document outlines ZPI's comprehensive Robocall Mitigation Plan, ensuring full compliance with the FCC's amended requirements under section 64.6305.

1. Contact Information

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Principals, Affiliates, Subsidiaries, and Parent Companies:

- Eric Stephens
 - Francesco Zappelli
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2. Implementation of STIR/SHAKEN Framework

zPaper, Inc. complies with the STIR/SHAKEN call authentication framework through its partnership with Bandwidth.com. This partnership ensures that:

- All outbound calls are attested under the STIR/SHAKEN framework.
- Calls originating from our network are validated to verify caller identity and detect spoofed calls.
- zPaper, Inc.'s customers benefit from the enhanced trust and call integrity provided by STIR/SHAKEN.

ZPI's underlying carrier is responsible for generating and transmitting appropriate attestation levels (A, B, or C) for calls originating from our network, in compliance with industry standards and FCC guidelines. For example, calls sent through the network with ZPI's DIDs assigned by their underlying providers are appropriately signed as attestation level A. ZPI confirms that no previous certification has been removed by Commission action.

3. Robocall Monitoring and Mitigation

ZPI's business is centered around medical paper exchange, and its voice resources are used only for electronic Fax transmission between doctor offices for example, therefore it ZPI does not anticipate any issues with Robocaller traffic through its network but nonetheless will comply with the commission's objective for robo call mitigation when necessary.

ZPI actively works to prevent illegal robocalls from originating or transiting through its network. Our approach includes:

- **Traffic Monitoring:**
 - Monitoring call patterns for anomalies, such as high call volumes to specific destinations or short-duration calls.
 - Investigating and addressing suspicious activity promptly.
 - **Customer Vetting:**
 - Verifying the identity of new customers and assessing the legitimacy of their intended usage.
 - Ensuring that customers agree to terms prohibiting illegal robocalling.
 - Taking reasonable steps to prevent new and renewing customers from originating illegal robocalls.
 - **Complaint Resolution:**
 - Providing a clear process for individuals to report suspected robocalls.
 - Investigating complaints and taking corrective actions, including termination of services for violators.
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4. Call Analytics and Upstream Provider Procedures

- **Call Analytics:**
 - ZPI employs third-party call analytics systems provided by underlying carriers to detect and mitigate suspected illegal robocall traffic, as ZPI is a small provider and does not have the need to maintain their own Class 4 switch platform or least cost routing.
 - These systems analyze call patterns in real-time to identify potential violations.
- **Upstream Provider Procedures:**
 - ZPI ensures that all upstream providers comply with FCC regulations and maintain updated RMD certifications.
 - Periodic reviews of upstream providers' practices are conducted to verify compliance.

5. Compliance with FCC Requirements

ZPI complies with all FCC rules and regulations regarding robocall mitigation, including:

- Filing certification and supporting documentation in the FCC's Robocall Mitigation Database (RMD).
- Ensuring that all required information, including our role in the call chain and details of STIR/SHAKEN implementation, is provided and updated promptly.
- Affirming that neither ZPI nor any affiliated entity has been subject to Commission or law enforcement action related to illegal robocalling, spoofing, or RMD certification deficiencies in the past two years.
- Committing to respond fully to traceback requests within 24 hours when emailed by the US Telecom ITG (Industry Traceback group).

6. Future Enhancements

ZPI is committed to improving its robocall mitigation efforts over time. Planned enhancements include:

- Deploying advanced analytics tools to identify and block suspicious traffic more effectively.
- Expanding customer education programs to raise awareness about robocalls and how to report them.
- Strengthening partnerships with industry organizations and regulators to stay ahead of emerging robocall trends.

7. Commitment to Correct Deficiencies

ZPI will respond promptly to any FCC notice of deficiency in its RMD certification. This includes:

- Updating RMD certifications and robocall mitigation plans to cure identified deficiencies.
- Providing detailed explanations to the FCC regarding corrective actions taken.
- Ensuring compliance within the specified timeframe to avoid removal from the RMD.

Conclusion

zPaper, Inc. is dedicated to protecting its customers and the public from the harm caused by illegal robocalls. Through robust partnerships, compliance with FCC regulations, and continuous improvement, ZPI ensures a secure and reliable voice service for its customers.