

zdSCADA, LP Robocall Mitigation Plan

Name of Service Provider: zdSCADA, LP

FCC Registration Number (FRN): 0032521379

Contact Information:

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This document outlines the specific measures implemented by zdSCADA, LP ("zdSCADA") to comply to with the requirements of [47 C.F.R. § 64.6305](#) (Robocall mitigation and certification) with regard to the origination, carrying, or processing of illegal robocall traffic.

zdSCADA does not furnish voice service to its customers, nor is it a gateway provider or non-gateway intermediate provider under [47 C.F.R. § 64.6300](#).

Robocall Mitigation

(a) Effective Measures

zdSCADA does not provide utilities for or permit customers to originate voice traffic as a part of our services. zdSCADA itself issues automated voice calls through our third party carrier [Bandwidth, Inc](#) as a part of our product offering for the purposes of alarming and production monitoring, with the prior express consent of the callee in accordance with [47 C.F.R. § 64.1200](#). zdSCADA does not issue voice calls for marketing/advertising purposes.

Our [terms of service](#) prohibit the use of zdSCADA.com or associated services for unlawful activities.

(b) Call Analytic Systems

zdSCADA logs diagnostic information and records statistics about all outgoing calls generated from zdSCADA.com. This includes the content of individual calls as well as overall call volume metrics. Log data is retained by zdSCADA and archived in AWS CloudWatch for 6 months. Metrics are retained in AWS CloudWatch according to their [retention policy](#), of up to 15 months with varying resolution.

Call volume metrics allow for the detection of unusual patterns or spikes in call behavior, which may indicate malicious activity within the system.

Diagnostic information about individual voice calls allows the identification of malicious usage and originating sources.

(c) Upstream Providers

zdSCADA has no upstream voice providers and therefore meets the obligations of [47 CFR 64.1200\(n\)\(5\)](#) to take reasonable and effective steps to ensure that any originating provider or intermediate provider, foreign or domestic, from which it directly receives traffic is not using the provider to carry or process a high volume of illegal traffic onto the U.S. network.

STIR/SHAKEN

zdSCADA does not meet the definition of voice provider, gateway provider or non-gateway intermediate provider under [47 C.F.R. § 64.6300](#), and therefore has no obligation with regard to the implementation of STIR/SHAKEN.

All outbound traffic is signed by our partner [Bandwidth, Inc](#) (FCN 0015443773) which has a complete STIR/SHAKEN implementation. The motivation for this filing despite zdSCADA not meeting the designation of a voice provider is a requirement under Bandwidth, Inc's Robocall Mitigation Plan that all upstream providers be registered in the RMD¹.

Traceback Requests

zdSCADA commits to respond in accordance with [47 CFR 64.1200\(n\)](#) to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

¹ Accordingly, Bandwidth requires that all of its upstream service providers (who may themselves be "Intermediate Providers", "Gateway Providers", "Originating Voice Service Providers" or "Foreign Service Providers") customers maintain valid registrations in the FCC's Robocall Mitigation Database ("RMD") and requires clear service-specific contractual requirements in which customers agree to cooperate with the ITG and agree to follow all applicable laws against illegal robocalling, fraud and abuse. *Bandwidth Inc and Affiliates Robocall Mitigation Plan (02.26.2024).pdf*