

Robocall Mitigation Plan

Business 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") 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;
- 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

Zach Rodgers, LLC ("Zach Rodgers") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates Zach Rodgers's RMP.

STIR/SHAKEN Compliance and Implementation

Zach Rodgers, LLC is fully compliant with the STIR/SHAKEN standards, a key framework designed to combat caller ID spoofing and enhance the integrity of voice communications. Achieving full compliance reflects our unwavering commitment to protecting consumers from illegal robocalls and fraudulent activities.

Implementation Details

- **Technology Adoption:** We have integrated STIR/SHAKEN technology into our network infrastructure, enabling the authentication and verification of caller ID information for all voice calls. This ensures that calls originating from and passing through our network are reliably identified, significantly reducing the potential for spoofing and fraud.

- Collaboration with Partners: In our journey to full compliance, we worked closely with our upstream providers and industry partners to ensure seamless implementation. Our collaborative efforts have ensured that our network's call authentication practices are in line with the highest industry standards.
- Continuous Monitoring and Compliance: We actively monitor our STIR/SHAKEN implementation to ensure ongoing compliance and effectiveness. Regular audits and updates to our systems are conducted in response to evolving industry standards and regulatory requirements.
- Commitment to Industry Best Practices: Beyond compliance, we are dedicated to adopting and promoting industry best practices related to call authentication. We engage in forums and working groups to stay at the forefront of developments in call authentication technology and regulatory requirements.

Impact on Robocall Mitigation

The full implementation of STIR/SHAKEN is a cornerstone of our robocall mitigation strategy. It enhances our ability to identify and block illegal robocalls, provides transparency for our customers, and builds trust in the communications ecosystem. Our commitment to STIR/SHAKEN compliance underscores Zach Rodgers's role as a responsible and proactive participant in the fight against robocalls.

Know Your Upstream Providers

In our dedicated effort to ensure the integrity of voice communications and combat caller ID spoofing, Zach Rodgers, LLC has established an exclusive upstream carrier partnership with ClearlyIP.

ClearlyIP.com
3255 W. Highview Drive
Appleton, WI 54914

This strategic choice allows us to leverage ClearlyIP's advanced technology and commitment to STIR/SHAKEN standards, ensuring that all calls passing through our network are authenticated and verified to the highest industry standards.

Partnership Objectives:

- Collaborative Compliance: Working closely with ClearlyIP, we ensure our network's full compliance with STIR/SHAKEN protocols, enhancing our ability to combat fraudulent calls.
- Unified Monitoring and Response: Our partnership facilitates shared monitoring efforts, enabling us to rapidly identify and address potential threats of illegal robocalls.
- Streamlined Communication: Direct communication channels with ClearlyIP allow for efficient coordination in implementing robocall mitigation strategies and responding to traceback requests.

ClearlyIP's reputation and technological capabilities complement our commitment to providing secure and reliable voice services. Through this partnership, we not only adhere to regulatory requirements but also advance our mission to protect consumers from unwanted and illegal robocalls.

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 Zach Rodgers in which we transmit, originate, and/or terminate calls on behalf of the subscriber.

Zach Rodgers's KYC program involves obtaining specific subscriber information before service is established and when payment is made for services. This process includes collecting such information such as:

- Physical business name and location
- Contact Name
- Contact Email Address
- Contact Phone Number
- Nature of the customer's business.
- Website of the business

Customer Identity Verification Processes

At Zach Rodgers, LLC, our approach to customer identity verification transcends traditional methods. Recognizing the critical role of trust and security in telecommunications, we have instituted a unique, personalized process for vetting and verifying our customers. This process is built on the foundation of direct, personal relationships with each customer, ensuring a high level of mutual understanding and trust.

Key Aspects of Our Verification Process:

- **Personalized Onboarding:** Every new customer relationship begins with a face-to-face meeting. This direct interaction allows us to understand our customers' needs and business operations intimately, ensuring that our services are a perfect fit for their requirements.
- **Document Verification:** Despite our personal acquaintance with customers, we adhere to strict compliance standards by verifying government-issued identification and, if applicable, business registration documents. This step is crucial for aligning with regulatory requirements and maintaining network integrity.
- **Continuous Engagement:** Our relationship with customers does not end with onboarding. We maintain ongoing, direct communication, allowing us to monitor any changes in their status or requirements and ensuring their continued compliance with our Acceptable Use Policy.

Our customer identity verification process is designed to be both personal and rigorous, reflecting our commitment to security, compliance, and customer satisfaction. By knowing our customers personally, we can provide a level of service and security that distinguishes Zach Rodgers, LLC in the telecommunications industry.

Operation Measures to Prevent Abuse

To maintain the integrity of our services and protect against potential abuse, we restrict the number of concurrent call paths available to our customers. A 'call path' represents a single, inbound or outbound call. By design, most of our customers are allocated up to three call paths at any given time. This limitation is calculated to support the legitimate communication needs of our customers

while effectively mitigating the risk of our network being used for the mass dissemination of robocalls.

Benefits of Our Approach:

- **Enhanced Network Security:** This proactive measure significantly reduces the potential for our services to be exploited for unauthorized or illegal activities, including the generation of robocalls.
- **Optimized Service Quality:** By managing the allocation of call paths, we ensure that our network remains robust and that service quality is maintained for all customers, free from the congestion that mass calling campaigns could cause.
- **Customer-Centric Configuration:** Our call path limitations are designed with our customers' needs in mind, providing sufficient capacity for their typical usage patterns while safeguarding against abuse.

This operational control is part of our broader commitment to upholding the highest standards of service integrity and customer trust. It reflects our proactive stance in not just complying with regulatory expectations but setting a benchmark for responsible network management in the telecommunications industry.

Acceptable Use Policy ("AUP")

Zach Rodgers, LLC maintains an AUP that subscribers must sign before being permitted to use Zach Rodgers'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
- Use of an Auto-Dialer is prohibited.
- Violating any applicable law
- Violating applicable industry accepted guidelines
- Using Zach Rodgers's service to engage in or in connection with fraudulent activities.

Zach Rodgers's, LLC contractual terms with subscribers specify that Zach Rodgers, LLC may take action up to suspension or termination of service for violation of the AUP.

Monitoring

Zach Rodgers, LLC works with its upstream provider to detect a calling pattern consistent with illegal robocalls. Zach Rodgers, LLC has created their own monitoring software taking advantage of the ClearlyIP Unity Trunking API. 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.

Investigate Suspicious Activity

If traffic analysis ever indicates the presence of likely illegal robocalling, Zach Rodgers follows the defined procedures for investigating such subscribers.

The procedures established include but are not limited to:

- Checking recent and past call detail records and benchmark against expected trends
- Reviewing recent and past account activity and purchases
- Verifying that the call originating path is valid
- Contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

Industry Traceback Group

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

Zach Rodgers, LLC commits to respond fully and within 24 hours 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 may use its service to carry or process calls.

Blocking

Zach Rodgers, LLC will implement Do Not Originate requests it receives from the ITG. Zach Rodgers has mechanisms to block suspicious calls using internal analytics. If Zach Rodgers’s LLC monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Zach Rodgers will take appropriate action which may include suspending or terminating the subscriber’s use of Zach Rodgers’s LLC network. Zach Rodgers, LLC will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including state attorneys general office), to the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices will evolve to respond to the dynamic nature of mitigating illegal robocalling. Zach Rodgers 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, Zach Rodgers, LLC will republish it to employees, consultants and contractors and file such an update with the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Zachary Rodgers

I, Zachary Rodgers, owner of Zach Rodgers, LLC, do hereby certify, under penalty of perjury, the following:

1. Zach Rodgers, LLC has fully implemented STIR/SHAKEN in the IP portions of it's network.
2. Zach Rodgers, LLC Business name and primary address is as follows
Zach Rodgers, LLC DBA Revolt Voice
98 North Broad St. Winder, GA 30680
3. Zach Rodgers, LLC DBA Revolt Voice has no other business names in use.
4. Zach Rodgers, LLC DBA Revolt Voice 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. Zach Rodges is the sole owner of Zach Rodgers, LLC DBA Revolt Voice
7. Zach Rodgers has never had his license denied/revoked by the FCC or been subject to an FEE enforcement proceeding.
8. Zach Rodgers, LLC role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
9. Zach Rodgers, LLC has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
10. Zach Rodgers, LLC is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
11. Zach Rodgers, LLC Operator Code Number is 423k



Zachary Rodgers