



Business Information

Integrated Communication Solutions Inc.

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Contact 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, outlines "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 robocalls.

ICS is reseller of services provided by upstream voice service providers. ICS has no control of their network and relies on them to provide caller attestation for calls presented to them by ICS users.

Purpose

Integrated Communication Solution, Inc. (“ICS”) is a Voice Service reseller dedicated to stopping illegal calls from originating in our network as much as reasonably possible. As certified in the FCC’s Robocall Mitigation Database, ICS has claimed exception from STIR and Shaken requirements. ICS is reseller of voice carrier services to multiple PBXs that we manage. All caller attestation is provided by upstream carrier that ICS resells to its customers.

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 ICS in which we transmit, originate, and/or terminate calls based on behalf of the subscriber. ICS, Inc. ICS’s KYC program involves obtaining specific subscriber information when the customer establishes service. This process includes collecting information such as:

- physical business location(s);
- contact person(s);
- nature of customer’s business

Know Your Upstream Providers

In accordance with the Commission’s directive in Advanced Methods to Target and Eliminate Unlawful Robocalls 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 (Rel. May 19, 2023) ¶¶ 49-51, ICS provides the following information concerning its upstream voice carriers.

ICS receives voice traffic from the following upstream providers:

- 1) Bandwidth Inc.
900 Main Campus Drive
Suite 100
Raleigh NC 27606

- 2) Skyetel Inc.
2901 Clint Moore Road
Suite 2, #215
Boca Raton, FL 33496
- 3) IXICA Communications Inc
10 Milner Business Court #300
Ontario M1B3C6 Toronto, Canada

According to the Robocall Mitigation Database, Bandwidth Skyetel and IXICA are fully STIR/SHAKEN compliant and, to the best of ICS's knowledge, information, and belief, Bandwidth, Skyetel and IXICA have been, and will continue to, sign calls transmitted to ICS, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to ICS.

Acceptable Use Policy ("AUP")

ICS maintains an AUP that subscribers are given before being permitted to use ICS's system(s). 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;
- Violating any applicable local, state, or federal law;
- Violating applicable industry accepted guidelines; and
- Using ICS's service to engage in or in connection with fraudulent activities.

ICS's terms with subscribers specify that ICS may act by suspending or terminating service for violation of the AUP.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify an outbound caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by ICS and/or obtained by ICS from one of ICS's underlying carriers for use by the subscriber. In all cases, ICS directly manages the TNs used by its subscribers. ICS tracks these numbers in its inventory system and monitors the assignment of these numbers. ICS denies the ability for customers to input any TN other than those assigned to the account as outbound caller identity and managed by ICS.

Analytics for Monitoring Traffic

ICS works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If ICS or its carrier partners detect a calling pattern consistent with illegal robocalls, we will identify the party and take appropriate action. Appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized ICS, Inc. to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our system. ICS uses Skyetel, Bandwidth.com and IXICA for TN Attestation and Verification implementation.

Investigate Suspicious Activity

When traffic analysis or automated alerting via Equinix indicates the presence of likely illegal robocalling, ICS's risk prevention team is alerted which follows the defined procedures on investigating such subscribers. The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

ICS follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, ICS devotes sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

ICS will implement Do Not Originate requests it receives from the ITG. ICS has procedures to block suspicious calls. If ICS identifies suspected robocalling patterns that are confirmed with further investigation, ICS will take appropriate action which may include suspending or terminating the subscriber's use of ICS's PBX systems. ICS will cooperate with investigative bodies, provide a single point of contact to address traceback requests from law enforcement, including state attorneys general offices, FCC, and ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. ICS 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, ICS 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 Darrell Reaves

I, Darrell President of ICS, Inc. ("ICS") do hereby certify the following:

(1) ICS fully relies on upstream carriers to attest to calls originating on PBX networks ICS manages and/or resells.

(2) ICS's business name and primary address are as follows:

Integrate Communication Solutions, Inc.

4000 Meadow Lake Drive

Suite 117

Birmingham, Alabama 35242

(3) ICS has no other business names in use.

(4) ICS 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) ICS's role in the call chain is that of a voice service reseller with no STIR/SHAKEN implementation obligation serving end-users.

(7) ICS has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

(8) ICS is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.