

Robocall Mitigation Plan

Business Information

Uber Wireless LLP
307 SW 11th St
Seminole, TX 79360

Contact Information

John Klassen
Owner
432-209-9400
john@uber-wireless.com

Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (adopted March 16, 2023) 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 includes:

- "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

Uber Wireless LLP ("Uber") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into its network. Uber is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Uber is exempt from the requirement that it implement STIR/SHAKEN in its network but is required to perform other robocall mitigation functions. As delineated herein, Uber works closely with its upstream provider to carry out its robocall mitigation requirements.

Know Your Customer

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

Uber's KYC program involves obtaining specific information when a subscriber signs up for service. This process includes collecting such information such as:

- name;
- existing telephone numbers and business websites;
- registered company details, trading names and registered office address;

- contact details of the senior manager with responsibility for numbering;
- information about the business customer's network and the services provided; and
- nature of the subscriber'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, Uber provides the following information concerning its upstream voice service carrier.

Atheral LLC
 1309 Coffeen Ave
 Ste 5838
 Sheridan WY 82801
 Attn: Daniel White
 robocall@atheral.com

Uber has a master service agreement with its upstream provider and has received assurances from its officials that it has, and will continue to, sign calls transmitted to Uber and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Uber. Uber and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Telephone Number Analytics

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the 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 Uber and/or obtained by Uber from its underlying carrier for use by the subscriber. Uber tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Uber's assignment of the TN to its subscriber.

Uber confirms that it will respond to traceback requests within 24 hours of receiving same.

Mitigation During Service

Uber works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP originated calls are signed with subscriber caller ID only after number validation via SMS;
- Requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.
- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Uber works with its upstream provider to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- Anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Uber works with its upstream provider to follow 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 particular use case and validate that the activity belongs to that subscriber.

Because Uber lacks the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Uber's analytics.

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

Blocking

Uber will implement Do Not Originate requests it receives from the ITG. Uber has mechanisms to automatically block suspicious calls using internal analytics. If Uber's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Uber will take appropriate action which may include suspending or terminating the subscriber's use of Uber's network. Uber will cooperate with investigative bodies to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or the 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. Uber 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, Uber will republish it to employees, consultants and contractors and file such an update within ten (10) days of such update.

Certification of John Klassen

I, John Klassen, Owner of Uber Wireless LLP ("Uber"), do hereby certify, under penalty of perjury, the following:

(1) Uber, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.

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

Uber Wireless LLP
307 SW 11th Street
Seminole, TX 79360

(3) Uber has no d/b/a names.

(4) Uber has not previously used any d/b/a names.

(5) The following entity owns more than 10% of Uber: John Klassen

p

(6) Uber has the following affiliates & subsidiaries: N/A

(7) None of the persons/entities listed herein have had their license denied/revoked by the FCC or been subject to an FCC enforcement proceeding.

(8) 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.

(9) Uber's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.

(10) Uber does not have, nor is it required to have, an operator company number.



John Klassen