

## **Robocall Mitigation Plan**

### Business Information

CallTrackingMetrics, LLC  
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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

CallTrackingMetrics, LLC ("CTM") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. CTM is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, CTM was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as CTM now file RMPs. This document delineates CTM's RMP. Because CTM does not have access to the necessary infrastructure, it relies on its upstream carriers to assist in robocall mitigation. As delineated herein, CTM works closely with its upstream providers to carry out the required mitigation functions.

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

CTM's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

#### Acceptable Use Policy ("AUP")

CTM maintains an AUP that subscribers must sign before being permitted to use CTM'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;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using CTM's service to engage in or in connection with fraudulent activities.

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

#### 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, CTM provides the following information concerning its upstream voice service carriers.

CTM's upstream providers are:

Twilio Inc.  
101 Spear Street, 1st Floor  
San Francisco California 94105  
Melissa Blassingame  
512-623-0512  
[mblassingame@twilio.com](mailto:mblassingame@twilio.com)

Plivo Inc.  
6001 W Parmer Ln  
Ste 370 PMB 2774  
Austin TX 78727  
Vinayak Bhat  
218-325-7676  
[vinayak@plivo.com](mailto:vinayak@plivo.com)

Telnyx, LLC  
311 West Superior St  
Suite 504  
Chicago IL 60654  
Sarah Halko  
312-945-7420  
[regulatory@telnyx.com](mailto:regulatory@telnyx.com)

CTM and its upstream providers have no contractual provisions regarding robocall mitigation. But CTM and its upstream providers work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests. All of CTM's upstream providers are listed as STIR/SHAKEN compliant in the Robocall Mitigation Database.

#### Mitigation During Service

CTM works with its upstream providers 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; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

#### Analytics for Monitoring Traffic

CTM works with its upstream providers 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);
- recent volumes (last 60 min) vs weekly trends;
- 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, CTM works with its upstream providers 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 CTM does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in CTM's analytics.

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

CTM works with its upstream providers to investigate suspicious activity found by the carrier's monitoring systems or reported to CTM by subscribers or third parties. The investigation could potentially result in opening a traceback request or with CTM contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated CTM contracts governing the transport of voice calls, CTM will endeavor to contractually require CTM's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

#### Blocking

CTM will implement Do Not Originate requests it receives from the ITG. CTM's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If CTM and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, CTM will take appropriate action which may include suspending or terminating the subscriber's use of CTM's service. CTM will cooperate with Investigative Bodies (provide a single point of contact 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 response to the dynamic nature of mitigating illegal robocalling. CTM 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, CTM 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 Laure Fisher**

I, Laure Fisher, Chief Operating Officer of CallTrackingMetrics, LLC ("CTM"), do hereby certify, under penalty of perjury, the following:

- a. CTM, 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.
- b. CTM's Business name and primary address are as follows:

CallTrackingMetrics, LLC  
231 Najoles Rd  
Suite 500  
Millersville, MD 21108

- c. CTM's dba is "CTM"
- d. CTM has not previously used any other business name.
- e. 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.
- f. The entities with 10% or more ownership interest are Laurie Fisher and Todd Fisher. CTM has no parent companies, subsidiaries, or affiliates
- g. CTM's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- h. CTM has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. CTM is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. CTM's operator company number is 041K.



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Laure Fisher