

Robocall Mitigation Plan

Business Information

SimSIP, LLC
307 5th Street, SW
Ste. 2
Willmar, MN 56201

Contact Information

Adam Miller
Owner
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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 (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;
- "know your upstream provider";
- ownership information;
- 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

SimSIP, LLC ("SimSIP") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. SimSIP has fully implemented STIR/SHAKEN. In compliance with the R&O, SimSIP submits this RMP and certification.

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 SimSIP in which it transmits, originates, and/or terminates calls based on behalf of the subscriber.

SimSIP has an onboarding call with each subscriber prior to providing service to provide information such as address, e911 locations, authorized contacts of the company and billing information. Payments are collected and can only be paid on the monthly generated invoices. SimSIP works with partners to grow its business and ensures each partner is a trustworthy and valid business partner.

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

SimSIP's upstream providers are:

Bandwidth, LLC
900 Main Campus Drive
Suite 500
Raleigh, NC 27607
Jeffrey Smitherman
jsmitherson@bandwidth.com

SkySwitch
751 Arbor Way
Suite 150
Blue Bell, PA 19422
support@skyswitch.com

SimSIP and its upstream providers have contractual provisions regarding robocall mitigation. SimSIP and its upstream providers work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

SimSIP maintains an AUP that subscribers must accept before being permitted to use SimSIP's network. See <https://www.simsip.com/legal>

Analytics for Monitoring Traffic

SimSIP works with its upstream carriers to analyze high-volume voice traffic to identify and monitor patterns consistent with robocalls. SimSIP itself monitors calls for irregular activity and ensures that each customer is a legitimate customer using its services for legitimate business purposes. SimSIP maintains a term of service, that allows it to immediately terminate service if illegal use is found.

If a calling pattern is detected that is consistent with illegal robocalls, SimSIP and its upstream providers will identify the party that is using its network to transmit 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.

No third-party vendors are involved in deploying SimSIP's analytics.

Investigate Suspicious Activity

SimSIP can track back the calls to its originating system and identify which customer it came from. If SimSIP sees illegitimate activity, it can block access immediately.

Blocking

SimSIP works with its upstream carrier to abide any Do Not Originate requests it receives from the Industry Traceback Group ("ITG") or other authorities. SimSIP will cooperate with investigative bodies (provide a single point of contact) to address traceback requests from law enforcement and regulatory entities such as state attorneys general, the FCC, and/or 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. SimSIP 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, SimSIP 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.

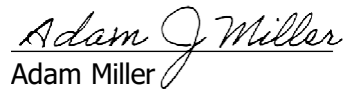
Certification of Adam Miller

I, Adam Miller, Owner of SimSIP LLC ("SimSIP") do hereby certify, under penalty of perjury, the following:

- a. SimSIP is fully STIR/SHAKEN compliant.
- b. SimSIP's business name and primary address are as follows:

SimSIP, LLC
307 5th Street, SW
Ste. 2
Willmar, MN 56201

- c. SimSIP has no other business name.
- d. SimSIP 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 individuals with 10% or more ownership in SimSIP are: Deb Shriver, Allen Hillstrom, and Brian Wies. SimSIP has no affiliates, parent companies, or subsidiaries.
- g. SimSIP's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation.
- h. SimSIP is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. SimSIP has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. SimSIP's Operator Code Number is 214L.


Adam Miller