

Robocall Mitigation Plan

Business Information

Bennett Computers LLC
64 Wall Street Road
Long Lane MO 65590

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, 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

Bennett Computers LLC ("Bennett") is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. Bennett is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Bennett was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as Bennett now file RMPs. This document delineates Bennett's RMP. Because Bennett does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, Bennett works closely with its upstream provider 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 that subscriber. A subscriber is an entity that has a business relationship with Bennett in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Bennett's KYC program involves obtaining specific information from its subscribers. This process includes collecting such information such as:

- physical business location; and
- contact person(s).

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, Bennett provides the following information concerning its upstream voice service carrier.

Bennett has one upstream provider from which it receives voice traffic:

Anveo Inc.
148 East Street Road
#107
Feasterville PA 19053
Ivan Chukhryaev
ivan.chukhryaev@anveo.com

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

Acceptable Use Policy ("AUP")

Bennett maintains an AUP that subscribers must agree to before being permitted to use Bennett's system. 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; and
- using Bennett's service to engage in or in connection with fraudulent activities.

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

Monitoring

Bennett works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Bennett detects a calling pattern consistent with illegal robocalls, we will identify the party and will 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 system. Bennett does not employ third-party analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Bennett's technical operations 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.

Bennett is familiar with and uses best efforts to follow the Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Bennett will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

Bennett will implement Do Not Originate requests it receives from the ITG. Bennett has procedures to block suspicious calls. If Bennett identifies suspected robocalling patterns that are confirmed with further investigation, Bennett will take appropriate action which may include suspending or terminating the subscriber's use of Bennett's system. Bennett 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), 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 must evolve to response to the dynamic nature of mitigating illegal robocalling. Bennett 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, Bennett 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 Clayton Bennett

I, Clayton Bennett, Manager of Bennett, do hereby certify, under penalty of perjury, the following:

- (1) Bennett, 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) Bennett 's Business name and primary address are as follows:

Bennett Computers LLC
64 Wall Street Road
Long Lane MO 65590
- (3) Bennett has no other business names in use
- (4) Bennett has not previously used any other business name.
- (5) Clayton Bennett is the only owner and manager of Bennett. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) 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.
- (7) Bennett's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) Bennett has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) Bennett is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) Bennett does not have an OCN.

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