

Robocall Mitigation Plan

Business Information

NWN Corporation
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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 (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

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

Know Your Customer

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

New Subscribers

All new subscribers go through identity verification protocols which are a mixture of algorithmic check and manual call back. A risk score is developed to ensure the authenticity of a new subscriber. This score checks the identity marker collected during an account registration process. These include but are not limited to: name, email address, credit card information and contact phone number.

These identity markers are validated for accuracy against public and paid tools. All new subscriber activity is monitored as further explained below.

Existing Subscribers

NWN requires updates of subscribers' information on all their orders. Each order's identity markers are verified again to ensure the account is not compromised and is being used for its intended purpose.

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

NWN has three upstream providers from which it receives voice traffic:

- 1) Bandwidth Inc.
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
voicsecurity@bandwidth.com
- 2) Nuwave Communications, Inc.
8275 South Eastern Ave
Suite 266
Las Vegas NV 89123
Kyle Thomas
kyle@nuwave.com
- 3) IntelPeer Cloud Communications LLC
155 Bovet Rd.
Suite 405
San Mateo CA 94402
Vu Tran
vtran@intelepeer.com

NWN has a master service agreement with NWN and has received assurances in writing from their officials it has, and will continue to, sign calls transmitted to NWN, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to NWN. NWN

and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy

NWN maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use NWN's network. Among other things, this 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 NWN's service to engage in or in connection with fraudulent activities.

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

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 NWN and/or obtained by NWN from one of NWN's underlying carriers for use by the subscriber. In most cases, NWN directly manages the TNs used by its subscribers. NWN tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of NWN's assignment of the TN to its subscriber.

Mitigation Through Contracts

All subscribers agree to participate in traceback requests (this is part of the Terms and Conditions which users must agree to when creating an account with us).

Mitigation During Service

NWN 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:

- Requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

NWN 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);

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

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

NWN works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to NWN by subscribers or third parties. The investigation could potentially result in opening a traceback request or with NWN 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 NWN contracts governing the transport of voice calls, NWN will endeavor to contractually require NWN's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

NWN will implement Do Not Originate requests it receives from the ITG. NWN has mechanisms to automatically block suspicious calls using internal analytics. If NWN's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, NWN will take appropriate action which may include suspending or terminating the subscriber's use of NWN's network. NWN 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. NWN 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, NWN 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 Frankel

I, Adam Frankel, General Counsel of NWN Corporation ("NWN"), do hereby certify, under penalty of perjury, the following:

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

NWN Corporation
659 South County Trail
Exeter, RI 02822
- (3) NWN has no other business names in use.
- (4) NWN has previously used the business name Barn System, Inc. (deactivated on June 8, 2006).
- (5) The following entity owns more than 10% of NWN: NWN Acquisition Holding Company LLC.
- (6) The following persons are NWN's directors: Kevin S. Penn, Noah S. Scherz, Jim Sullivan.
- (7) NWN has the following affiliates: ASP NWN Parent Holdings LLC, ASP NWN Intermediate Holdings LLC, ASP NWN Acquisition Co LLC, NWN Carousel Target LLC, NWNComm LLC, NCapital LLC, Carousel Industries of North America LLC, Hannibal SCT Realty LLC, ASP NWN Corporate Parent Holdings LLC, ASP NWN Corporate Intermediate Holdings LLC, ASP NWN Corporate Acquisition Co LLC, NWN Acquisition Holding Company LLC, ComFrame Software Corporation, Western Blue Corporation, Systems Engineering, Inc., Atrion Holdings, Inc., Atrion, Inc. (RI), Atrion, Inc. (NJ).
- (8) NWN has the following subsidiaries: ComFrame Software Corporation, Western Blue Corporation, Systems Engineering, Inc., Atrion Holdings, Inc., Atrion, Inc. (RI), Atrion, Inc. (NJ).
- (9) None of the persons/entities in items 5 – 8 above have had their license denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (10) 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.
- (11) NWN's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (12) NWN has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

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

(14) NWN is not required to, and does not have, an operator company number.

Adam Frankel
Signing Time: Feb 13, 2026, 11:05:52.563 a.m. (EST)
box SIGN 4WLZLL81-18Q9QZPQ

Adam Frankel