

Robocall Mitigation Plan

Business Information

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Contact Information

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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, 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;
- "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 an 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

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

Callback Functionality

ITS is integrated with third-party software platforms that allow customers to request a callback. A customer submits a callback request and provides a callback phone number.

- The customer is authenticated using an ITS-issued PIN.
- ITS places an outbound callback to the customer via ANI Networks.
- At the start of the call, ITS plays a clear, audible message identifying the call as originating from callenQ, stating that the call was requested by the customer, and providing contact information in the event the call was not desired.

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

Subscribers disclose their Name, service address, and billing address. Subscribers are given a PIN number to use the service. The service connects callers to pre-defined outbound numbers only. Subscribers can request a callback to any arbitrary number. This call also requires the subscriber to use their PIN. A recorded message is played on this call stating the call is a callback call and to contact support if it is unwanted.

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, ITS provides the following information concerning its upstream voice service carriers:

Affinity Network, Inc.
250 Pilot Rd
Suite 220
Las Vegas, NV 89119
Diane Michelin
dmichelin@aninetworks.com

Leap Telecom
21699 E Quincy Ave
Unit F-285
Aurora, CO 80015
David Aldworth
stirshakenhelp@teliax.com

Ringer LLC
21699 E Quincy Ave
Unit F-285
Aurora, CO 80015
David Aldworth
stirshakenhelp@teliax.com

BCM One Inc, dba Flowroute
12725 Morris Road
Suite 420
Alpharetta GA 30004-5023
Douglas E Fechter
dfechter@bcmone.com

Bandwidth Inc.
2230 Bandmate Way
Raleigh NC 27607
Stephen Thayer
voicesecurity@bandwidth.com

To the extent that ITS were to receive information from law enforcement or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. While ITS's agreements with its upstream providers contain no provisions specific to robocall mitigation, ITS has received assurances from them that they have, and will continue to, sign calls transmitted to ITS and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic.

Acceptable Use Policy ("AUP")

ITS maintains an AUP that subscribers must agree to before being permitted to use ITS' network. ITS' AUP is here: <https://callenq.com/terms/>

Analytics for Monitoring Traffic

ITS 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 (fixed 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).

No third parties are involved in deploying ITS' analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, ITS 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.

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

ITS will respond to any and all traceback requests within 24 hours.

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

Blocking

ITS will implement Do Not Originate requests it receives from the ITG. ITS’ upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If ITS and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, ITS will take appropriate action which may include suspending or terminating the subscriber’s use of ITS service. ITS will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, the FCC, and the ITG; as well as documenting requests & actions taken in response thereto).

Plan Updates

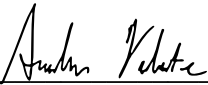
This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. ITS will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, ITS 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 Andrew Valiente

I, Andrew Valiente, CEO of Instant Telecom Solutions, Inc. ("ITS"), do hereby certify, under penalty of perjury, the following:

- a. ITS, 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. ITS's Business name and primary address are as follows:
Instant Telecom Solutions, Inc.
9002 Six Pines Dr, Ste 121
Shenandoah TX 77380-4271
- c. ITS has two business names: enQ and callenQ.
- d. ITS 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. ITS's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- g. ITS has one owner: Andrew Valiente, who owns 100% of ITS.
- h. ITS has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. ITS is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. ITS is not required to, and does not have, an operating company number.



Andrew Valiente

Date: Jan 28 2026