

Intrepid Telecom, Inc.

PO BOX 469
Houston, TX 77001
(281) 826-5800

Contact Information

Michael Palmer
President
(281) 826-5800

Robocall Mitigation Plan Policy Overview

Subject to the Commission's recent release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking ("R&O") and specifically WC Docket No. 17-97 (rel. March 17, 2023) requiring all voice service providers ("VSP") to file robocall mitigation plans ("RMP") that:

1. outline the VSP's "reasonable steps" to avoid originating illegal robocalls;
2. "Know your customer" procedures;
3. describe call analytics used to identify and block illegal traffic;
4. identify third-party vendors used in the process of telephone call delivery; Intrepid Telecom, Inc. is compelled to comply.

Purpose:

Intrepid Telecom, Inc. is a Voice Service Provider providing Hosted and Managed PBX services by utilizing third party voice network providers Commio, and Twilio which is an integral part of the Robocall Mitigation plan described below.

Intrepid Telecom, Inc. is dedicated to stopping illegal calls from originating within its network.

Intrepid Telecom, Inc. is certified in the FCC Robocall Mitigation Database as having fully implemented third party STIR/SHAKEN, which is implemented thru upstream providers, which sign attestation A for all outbound traffic with Intrepid Telecom, Inc. provisioned numbers, and attestation B for non-Intrepid Telecom, Inc. owned, such as a user forwarding caller ID from a cellular inbound call to an outbound. Intrepid Telecom, Inc. certifies that 100% of its customers traffic is directly signed by its providers Twilio and Commio.

In compliance with the R&O, Intrepid Telecom, Inc. submits this updated Robocall Mitigation Plan and certification.

Know Your Customer (“KYC”)

The secure identification of a subscriber using services provided by Intrepid Telecom, Inc. is explicitly tied to a User ID issued to the subscriber (a “subscriber” is an entity that has a business relationship with Intrepid Telecom, Inc.) Typically, this User ID is a valid US telephone number, a valid US IP address or unique 10-digit number. In the event a User ID is other than a valid US telephone number, User ID is specifically tied to a valid US number associated to the subscriber’s account. Pursuant to the Commission’s requirements of STIR/SHAKEN, all outbound calls placed on the network are signed by our upstream provider with and only with the valid US telephone number assigned to Intrepid Telecom, Inc. on behalf of the subscriber and associated with the User ID assigned to the subscriber.

Additionally, all subscribers PBX systems are wholly managed by Intrepid Telecom, Inc. thus allowing an active role in identifying its customers before the first telephone call is placed. Intrepid manages all PBX systems and does not resell trunks or dial tone. All calls must be placed through a hosted PBX which is directly trunked to its upstream providers, who attest to calls. Intrepid implements KYC processes including collecting the following information:

- physical address of the business, person or entity placing calls
- physical address of each device on which telephone calls are initiated (911/711 purposes)
- contact persons, alternate phone numbers and email addresses
- nature of customer’s business
- projected inbound and outbound call requirements

In addition to the procedures detailed above, Intrepid Telecom verifies the identity of all new and renewing customers by obtaining government-issued identification (e.g., EIN, SSN, or Passport) and cross-referencing physical addresses against official business registry records.

Know Your Upstream Provider

Pursuant to 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. May19, 2023) ¶¶ 49-51, Intrepid Telecom, Inc. provides the following information concerning its upstream voice carriers.

Intrepid Telecom, Inc. receive voice traffic from the following upstream providers:

1. ThinQ (DBA Commio) - 5420 Wade Park Blvd Suite 100 Raleigh NC 27607
2. Twilio - 101 Spear Street, 1st Floor San Francisco CA 94105

According to the FCC's Robocall Mitigation Database, each of Commio, and Twilio are fully STIR/SHAKEN compliant and, to the best information available to officers and directors of Intrepid Telecom, Inc., it is reasonable to believe that Commio, and Twilio will continue to comply with the Commission's directives relative to the delivery of voice traffic into Intrepid Telecom, Inc's customer base.

Traceback

Intrepid Telecom, Inc. commits to work with Commio, and Twilio to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robo callers from originating calls. Once a traceback request is received, call history records and other tools will be used to investigate the subject calls and obtain information to be turned over the requesting party. The Company will also use customer profile information to aid in analyzing claims of suspected fraudulent calling. The Company will reach out to the customer for explanation if necessary.

Traceback Contact Information:

Intrepid Telecom Support Desk: 281-826-5800 - Option 2 / support@intrepidtelecom.com

Acceptable Use Policy ("AUP")

Intrepid Telecom, Inc. maintains AUP on its website. AUP must be signed as part of the sign-up process. Among other things the AUP prohibits:

- Providing altered, deceptive, or false information about the identity of the caller or the origin of a message or phone call;
- Violating any applicable federal, state or local law;
- Violating applicable industry accepted guidelines; and
- Using any Intrepid Telecom, Inc. service to engage in or to participate in any fraudulent activity.

Contract terms of Intrepid Telecom, Inc. telephone services specify immediate suspension or termination of service for any violation of its AUP.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify an outbound 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 and/or obtained by Intrepid Telecom, Inc. from one of its underlying carriers for use by the subscriber.

Intrepid Telecom, Inc. directly manages the TNs used by its subscribers. These numbers are inventoried, assigned, billed, and monitored using industry standard methods.

Intrepid Telecom, Inc. prevents its customers' ability to input any TN other than those assigned to the account as outbound caller identity, or forwarded through the system from an inbound call.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Intrepid Telecom, Inc., then a rigorous TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Intrepid Telecom, Inc. will attest calls originated with these TNs, however, they will be signed with a "B" attestation.

All PBX systems are managed by Intrepid Telecom, Inc., and therefore unable to make robocalls, since these systems are managed and monitored 24/7. Intrepid Telecom, Inc. does not provide wholesale services, SIP trunks, or service to anyone using call implementations not authorized by Intrepid Telecom, Inc.

Analytics for Monitoring Traffic

Intrepid Telecom, Inc. implements computer programs that actively scan traffic patterns, volume, frequency, IP source, device user agent and origination authentication credentials of each subscriber outbound call for irregularities consistent with automated dialing and potentially illegal robocalling. We have monitoring systems watching call activity 24/7/365, as well as limit traffic patterns using AI to disallow large spikes in service. In addition, Intrepid Telecom, Inc. works closely with its upstream and downstream providers to detect automated calling consistent with illegal robocalling.

Call Blocking

Intrepid Telecom, Inc. has a 'zero tolerance policy' related to illegal robocalling. Any TN alerted by our internal scans, reported by upstream or downstream provider, reported by law enforcement or any court of competent jurisdiction is immediately and summarily suspended pending further investigation. Investigations are swift and biased toward the alert or reporting entity. If, within 24 hours of suspension a subscriber cannot adequately justify the call or calls in question, the subscriber's account is terminated. Further, Intrepid Telecom, Inc. will retain TN for a period of 1 year or notice of local number port ("LNP"). In the event of LNP, the TN(s) in question is affixed with notice of our findings to alert next provider of previous robocalling violation.

Plan Updates

Intrepid Telecom, Inc. recognizes that this plan, FCC regulations and industry best practices must continue to evolve to stamp out illegal robocalling. Intrepid Telecom, Inc. is committed to implementing industry best practices, FCC compliance and to continuously improve our internal processes to ensure the goal of eliminating illegal robocalling. In accordance with 47 CFR § 64.6305, Intrepid Telecom commits to updating its Robocall Mitigation Database filing within ten (10) business days of any material change to its operations or certification status.

Certification

I, Michael Palmer, President of Intrepid Telecom, Inc. does hereby certify the following:

1. Intrepid Telecom, Inc. has partnered with upstream providers to ensure that STIR/SHAKEN has been fully implemented in the IP portions of their network.
2. Intrepid Telecom, Inc. has the following primary business address:

Intrepid Telecom, Inc.
1421 Preston St. Ste 1000
Houston, TX 77002
3. The name title, department, business address, telephone number and email address of the individual responsible for addressing robocall-related issues are listed herein.
4. Intrepid Telecom, Inc. is a Voice Service Provider.
5. Intrepid Telecom, Inc. has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
6. Intrepid Telecom, Inc. is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or caller ID spoofing.

Michael Palmer

President

Intrepid Telecom, Inc.