

Robocall Mitigation Plan

Business Information

HTDNET, LLC
4712 Dumfries Road
Catlett, VA 20119

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

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

Know Your Customer ("KYC")

We vet all our customers and have a direct relationship with them.

HTDNET's KYC program involves obtaining specific subscriber information when starting services. This process includes collecting such information such as:

- physical business location;

- contact person(s);
- contact information;
- nature of the customer's business.

We ensure customers keep their physical address and contact information on file is up-to-date and current. To facilitate the local number portability for the customers transitioning to our service, we require the latest invoice from their previous voice service provider.

We ensure we are dealing with legitimate local companies/residences that have a physical address and system call logs are reviewed at least on a quarterly basis to help ensure our customers are using our systems appropriately. We can discover illegal robocalls by analyzing usage, for example, when it exceeds the customer's normal rates.

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

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

PayG LLC d/b/a Skyswitch ("Skyswitch")
 295 Madison Ave
 FL 5
 New York NY 10017
 Jennifer Nading
 747-777-8100 ext. 4619
 jnading@skyswitch.com

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

HTDNET maintains an AUP that subscribers must sign before being permitted to use HTDNET's network. Among other things, the AUP prohibits:

- any abusive use of our network or Services;
- any use of Device/Equipment/Services for an unlawful or fraudulent purpose;
- any use of Device/Equipment/Services in a way that ... generates spam or other abusive messaging or calling;
- providing inaccurate or misleading credit information.

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

Analytics for Monitoring Traffic

HTDNET works with its upstream provider to help investigate potentially illegal robocalls as well as using call metrics provide through our upstream provider's interface.

For example, we investigate substantial change in cost generated by calls from a single customer.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, HTDNET works with its upstream provider to follow defined procedures on investigating such subscribers.

Because HTDNET does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in HTDNET's analytics.

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

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

Blocking

HTDNET will implement Do Not Originate requests it receives from the ITG. HTDNET's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If HTDNET and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, HTDNET will take appropriate action which may include suspending or terminating the subscriber's use of HTDNET HTDNET's service. HTDNET 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. HTDNET 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, HTDNET 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 Matthew Demaree

I, Matthew Demaree, CEO of HTDNET, do hereby certify, under penalty of perjury, the following:

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

HTDNET, LLC
4712 Dumfries Road
Catlett, VA 20119
- (3) HTDNET uses the business name "HTDNET" and has no other business names in use.
- (4) HTDNET has not previously used any other business name.
- (5) The following person is the Company's owner with more than 10% interest and director: Matthew Demaree. This person 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) HTDNET's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) HTDNET has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) HTDNET is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) HTDNET's operating company number is 432K.

 3/27/2024

Matthew P. Demaree