

Robocall Mitigation Plan

Business Information

Platinum CS, LLC
3310 South Broadway Avenue Ste. 224
Tyler, TX 75701

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

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

Platinum's KYC program involves obtaining specific subscriber information. This process includes collecting such information such as:

- Legal Company Name
- Brand Name
- Country of Registration
- Type of Entity
- Business Address
- Industry
- Purpose of Usage
- 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, Platinum provides the following information concerning its upstream voice service carrier.

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

PayG, LLC dba Skyswitch ("Skyswitch")
295 Madison Ave
FL 5
New York NY 10017 Frank
Babusik
frank@skyswitch.com

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

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

- reselling or transferring the Service or the Device to another party without Platinum's prior written consent;
- using the Service or the Device for auto-dialing, continuous or extensive call forwarding, telemarketing (including, without limitation, charitable or political solicitation or polling), fax or voicemail broadcasting or fax or voicemail blasting.

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

Mitigation During Service

Platinum 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).

Analytics for Monitoring Traffic and Investigate Suspicious Activity

Platinum works with its upstream provider, Skyswitch, to identify behavior which indicates illegal call activity.

Skyswitch uses software for identifying suspicious calls and sending alert points to the device in question. The software provides detailed reporting identifying suspected illegal robocalls and alerts SkySwitch if Skyswitch originates any calls where the calling number is:

- Invalid
- Unallocated

Skyswitch attests that it will immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate. It disables the line and changes the registering password if a suspicious call is detected.

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

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

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

Blocking

Platinum will implement Do Not Originate requests it receives from the ITG. Platinum's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If Platinum and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Platinum will take appropriate action which may include suspending or terminating the subscriber's use of Platinum's service. Platinum 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. Platinum will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

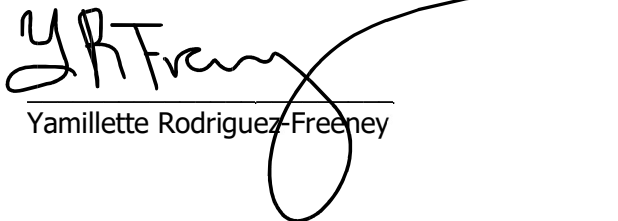
In the event of any material change to this plan, Platinum will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Yamillette Rodriguez-Freeney

I, Yamillette Rodriguez-Freeney, President of Platinum, do hereby certify, under penalty of perjury, the following:

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

Platinum CS, LLC
3310 South Broadway Avenue Ste. 224
Tyler, TX 75701
- (3) David M. Fortriede and I are Platinum's only principals, owners, and officers. Neither of us have had any licenses/authorizations revoked or been subject to any other FCC enforcement actions.
- (4) Platinum CS does business as Platinum Communication Solutions.
- (5) Platinum CS has not previously used any other business name.
- (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) Platinum's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) Platinum has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) Platinum is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.


Yamillette Rodriguez-Freeney