

Robocall Mitigation Plan

Business Information

CG Computer Works LLC ("CGCW")
1180 Collier Drive
Conway, AR 72032

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

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

CGCW's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information as:

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

In order for us to provide the services, customers must sign an Alternative Caller Identification Agreement, a Letter of Agency, and a Request for Release of Customer Information from their previous carrier. We also require clients to provide us with their previous phone bills and both their billing address and mailing address. We only conduct on-site installations and site surveys to ensure the legitimacy of the business establishment.

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

CGCW has two upstream providers from which it receives voice traffic:

- 1) Telnyx
311 West Superior St
Chicago IL 60654
Sarah Halko
regulatory@telnyx.com
- 2) Intrado Communications, LLC (d/b/a Flowroute)
11808 Miracle Hills Drive
Omaha Nebraska 68154
Todd Kawamura
tkawamura@flowroute.com

CGCW has received assurances in writing from Telnyx's and Flowroute's officials that they have, and will continue to, sign calls transmitted to CGCW, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to CGCW. CGCW 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 ("AUP")

CGCW maintains an AUP that subscribers must sign before being permitted to use CGCW's network. Among other things, the 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 CGCW's service to engage in or in connection with fraudulent activities.

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

Analytics for Monitoring Traffic

CGCW works with its upstream provider to identify behaviors which indicate illegal call activity. An example of calling patterns monitored include anomalies in cost generated by calls from a single customer.

Weekly audits are conducted to monitor call rates, debug carrier tools, and set call thresholds to prevent international calls. Outbound voice profiles are established to prevent fraudulent activities.

CGCW does not employ third-party traffic analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, CGCW 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 CGCW does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in CGCW's analytics.

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

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

Blocking

CGCW will implement Do Not Originate requests it receives from the ITG. CGCW's upstream provider has mechanisms to automatically block suspicious calls using internal analytics.

Outbound calls can be blocked by call restriction to verified extensions configured by TCW. TCW is an internet provider and reseller of VoIP services that ensures STIR/SHAKEN compliance by relying on our upstream providers. All calls prior to routing to the Public Switched Telephone Network are signed for compliance by our upstream provider. Before reaching our upstream provider, there are measures TCW takes via our licensed phone system provider, 3CX. Blacklisting of unauthorized

attempts and limiting outbound calls to specific extensions helps mitigate robocalls prior to our upstream provider taking necessary action.

If CGCW and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, CGCW will take appropriate action which may include suspending or terminating the subscriber's use of CGCW's service. CGCW 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.

Other Steps to Mitigate Illegal Robocalls

Prior to reaching our upstream providers, all originating calls are limited by 3cx from 4-32 simultaneous calls max, and security is in place to blacklist unauthorized attempts to access phone system to make robocalls.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. CGCW 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, CGCW 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 Joe Hill

I, Joe Hill, CFO of CGCW, do hereby certify, under penalty of perjury, the following:

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

CG Computer Works LLC
1180 Collier Drive, Conway, AR 72032
- (3) CGCW does business as TCW. CGCW has no other business names in use except TCW.
- (4) CGCW has not previously used any other business name except as set forth in certification (3).
- (5) The following entity owns more than 10% of CGCW: CG Communications LLC.
- (6) CGCW's principals are Brad Brannon, Joe Hill, Jeff Fox
- (7) The following entities are affiliated with CGCW: TCW Holdco LLC, TCW Legacy LLC, SG-TCW, LLC, CG TCW Invest LLC, CG TCW 2 LLC, Patrick A. Wilson, CG Special Situations LLC, Circumference Group Holdings LLC, Jeffrey H. Fox Revocable Trust, The Stephens Group, LLC, Elizabeth S. Campbell Revocable Trust, W.R. Stephens, Jr. Revocable Trust.
- (8) None of the individuals or entities listed in items 5 - 7 had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) 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.
- (10) CGCW's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (11) CGCW has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (12) CGCW is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (13) CGCW does not have an Operating Company Number and is not required to have one.

/Joe Hill/
Joe Hill

Date: December 11, 2024