

Virgh Robocall Mitigation Plan

Business Information

Virgh
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04544

Contact Information

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Overview

Virgh, as a VoIP reseller, places a paramount emphasis on ensuring the integrity and reliability of its communication services. In its commitment to providing a seamless and secure communication experience for its clients, Virgh has strategically partnered with ClearlyIP and leverages their robust robocall mitigation plan. ClearlyIP's advanced and comprehensive approach to combating robocalls aligns seamlessly with Virgh's dedication to offering a high-quality VoIP solution. By integrating ClearlyIP's cutting-edge technology, Virgh not only enhances the overall trustworthiness of its communication platform but also takes a proactive stance against the growing threat of robocalls. This collaborative effort not only safeguards Virgh's clients from the nuisance of unwanted automated calls but also underscores Virgh's commitment to delivering a secure and reliable VoIP service in an ever-evolving telecommunications landscape.

For reference ClearlyIP's Robocall Mitigation Plan is below.

Robocall Mitigation Plan

Business Information

Clearly IP Inc. ("Clearly IP")
3255 W Highview Dr
Appleton WI 54914

Contact Information

Anthony Lewis
CEO
920-383-3100
carriers@clearlyip.com

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

Clearly IP is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, Clearly IP has fully implemented STIR/SHAKEN. In compliance with the R&O, Clearly IP submits this RMP and certification.

Know Your Customer ("KYC")

Clearly IP is a small company, we have a small number of customers. We know our customers and understand their use cases.

From our portal when a Customer signs up for service we gather the following information related to the Customer:

- Business Name
 - Business Address
 - Contact Name
 - Contact Email Address
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- Contact Phone Number
 - Website
 - IP Address they signed up from
 - Valid Credit Card that matches the address and name of the person who is signing up
 - Description of the type of outbound calls the customer will be placing. We do not accept calls that are placed through a Robo Dialer or outbound blast calling. All outbound calls must be dialed by a human and be for the normal course of legal business.

After customers sign up for service from our portal, we send them a communication stating that, as part of our verification process, and to maintain compliance with federal regulations regarding Know Your Customer (KYC) and STIR/SHAKEN, we require additional information from customers to move forward with account verification before they can make or receive any calls on our network. We request the following documents:

- 1) Picture copy of the credit card (front and back) placed on the account for billing with all but the last four digits obfuscated for security purposes.

- 2) Picture copy of the Photo Identification/Govt ID (front and back). It is also required that the ID matches the name on the credit card above.

Once provided by the customer, this information is uploaded via our Customer Service/Account Verification team (normally within the same Business Day) for processing, and we reply once the customer's account has been verified.

Until customers provide the required information and we vet it, we do not allow inbound or outbound calls from the customers on our platform.

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

Clearly IP has two upstream providers from which it receives voice traffic:

- 1) Bandwidth.com
900 Main Campus Drive
Suite 100
Raleigh NC 27606 Stephen
Thayer
voicsecurity@bandwidth.com
- 2) Inteliquent/Sinch 550 W. Adams St.
Suite 900
Chicago IL 60661 Stacy
Graham
stacy.graham@sinch.com

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

Clearly IP maintains an AUP that subscribers must agree to before being permitted to use Clearly IP's software and services. Among other things, the AUP prohibits:

- 1) **Use with LCR:** Customer may not use the Service (as defined in the Terms and Conditions posted by Clearly IP from time to time at <https://www.clearlyip.com/legal>) with (or in connection with) a least cost router (or "LCR"), which Clearly IP will determine, in its reasonable discretion, based upon analysis of Customer's traffic patterns in the ordinary course of business.

- 2) **Use with Auto-Dialer (or "Robo-Dialer"):** Customer may not use the SIP Trunking Service with (or in connection with) an auto dialer (or "Robo-dialer"), which Provider will determine, in its reasonable discretion, based upon analysis of Customer's traffic patterns in the ordinary course of business.
- 3) **If using "North America Domestic Call Path Subscription" Voice Service, the following restrictions and limitations also apply:**
 - a. **Standard Business Use:** The Service is provided for Standard Business Use for a single company only. Clearly IP reserves the right to ensure that the Customer's use of the Service is consistent with Standard Business Use and otherwise complies with the Terms and Conditions. If Clearly IP determines that a Customer is not using the Service for Standard Business Use for a single company, Clearly IP may, in addition to all other rights and remedies pursuant to the Terms and Conditions, notify Customer and allow Customer the opportunity to cure any such use within two (2) calendar days. Customer may cure by stopping any such use, buying more trunks in order to comply with Standard Business Use, or change Customer's use of the Service in any other way that is consistent with Standard Business Use. Additionally, Clearly IP reserves the right to in any combination (i) immediately terminate the Service, (ii) charge a minimum inappropriate use fee of CA\$500.00 and/or charge CA\$0.05 per minute for all calls made during such periods of prohibited use (plus applicable toll free and international charges), whichever is higher, to Customer's payment method of record, and (iii) all applicable termination fees described in these Terms and Conditions.
 - b. **Not for Wholesale:** The North America Domestic Call Path Subscription service is not to be used with any type of Softswitch or Call Router with the intention of feeding phone service from a service provider to their customers using their own Softswitch or Call Router in a wholesale/resale environment. This service is to be registered to a single PBX/Phone System direct that belongs to a customer for their own internal use only. You are not to use any Trunking service for purchasing and porting the numbers out to another service provider. Clearly IP may determine, in its reasonable discretion, if Service is being purchased or used in violation of this provision, based upon analysis of Customer's traffic, purchase and cancellation patterns in the ordinary course of business. In addition to all other remedies that Clearly IP has listed as part of the terms listed in this agreement, Clearly IP has the right to assess a Port Out fee of up to \$50.00 per phone number that is being ported out of an account that Clearly IP has reasonably determined is being used for the resale of phone numbers.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones verified through automated-number-validation voice call. Subscribers can sign a form allowing them to use Caller IDs not purchased through our platform or verified by validation call for outbound calls, functionality that is restricted to customers with whom we've had human contact by phone call or in-person. This form:

- prohibits the sending of outbound traffic via the PSTN with Caller IDs not owned by the customer or the customer's subscribers; and
- states that, if Clearly IP receives notice that the Customer's outbound calls through our platform are deemed to be spam, Clearly IP has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

Clearly IP works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

No third-party vendors are involved in deploying Clearly IP's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Clearly IP follows the 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 or her particular use case and validate that the activity belongs to that subscriber.

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

Blocking

Clearly IP will promptly respond to Do Not Originate requests it receives from the ITG. Clearly IP has mechanisms to automatically block suspicious calls using internal analytics. If Clearly IP's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Clearly IP will take appropriate action which may include suspending or terminating the subscriber's use of Clearly IP's network. Clearly IP will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and actions taken in response thereto.

Clearly IP blocks calls that exceed a certain number of calls per mins/sec from a customer and blocks calls that are not using an authorized caller ID.

Clearly IP has a database of DNO numbers and can in real time add numbers to it.

Plan Updates

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

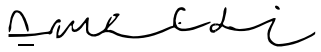
In the event of any material change to this plan, Clearly IP will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Anthony Lewis

I, Anthony Lewis, the CEO of Clearly IP, do hereby certify, under penalty of perjury, the following:

1. Clearly IP has fully implemented STIR/SHAKEN in the IP portions of its network.
2. Clearly IP's Business name and primary address are as follows:

Clearly IP Inc
3255 W Highview Dr Appleton WI 54914
3. Clearly IP has no other business names in use.
4. Clearly IP has not previously used any other business name.
5. 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.
6. The following is the list of Clearly IP's owners with more than 10% interest each/directors:
Anthony Lewis, Bryan Walters, Luke Duquaine, Preston McNair.
7. None of the persons in item 5 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
8. Clearly IP's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
9. Clearly IP has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
10. Clearly IP is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
11. Clearly IP's Operator Code Number is 704J



Anthony Lewis