

Robocall Mitigation Plan

Business Information

Really Communications, Inc.
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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

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

Really Communications' KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as the customer's physical location (we serve residential customers).

Really Communications also uses Telgoo5 fraud prevention tools, including requiring an ID, address validation, duplicate checks, etc.

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

Really Communications has one upstream provider from which it receives voice traffic:

T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue WA 98006
Kathleen Foster
RobocallMitigationSupport@T-Mobile.com

Really Communications has a master service agreement with its upstream provider. Really Communications 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")

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

- transmitting spam, chain letters, or other unsolicited email;
- impersonating another person or otherwise misrepresenting one's affiliation with a person or entity, conducting fraud, hiding or attempting to hide one's identity;
- misleading or attempting to mislead any person as to the nature or origin of any communication; re-classifying or re-originating traffic or taking any other action to intentionally make traffic appear as if it: (i) is anything other than the type of traffic delivered to the called party or (ii) originated from a place or on a type of equipment different from the place or type of equipment from where it, in fact, originated; and/or modifying, altering, or deleting in any manner calling party number information, originating point codes, or any other signaling information or call detail in connection with the transport and termination of traffic to the called party;
- using the Services and/or Products in a manner that is actually or potentially libelous, threatening, harmful, harassing, indecent, obscene, in violation of the intellectual property rights of any party, or violates any applicable federal, state and local laws, rules and/or regulations (including without limitation the regulations of the FCC governing the Citizens Broadband Radio Service);
excessive voice usage, including, but not limited to excessive or frequent calls to the same telephone number, excessive inbound or outbound calls, excessive calls during business

hours, excessively long calls to a single telephone number, calls made to numerically sequential telephone numbers, excessive calls to territories of the United States, high volume termination and re-initiation of calls, engaging in continuous or extensive call forwarding, using the Services for transmission or reception of broadcasts, telemarketing, fax broadcasting, chat lines, conference bridge or call center functions, or using an auto-dialer in connection with the Services.

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

Mitigation During Service

Really Communications 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). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Really Communications works with its upstream provider to identify behaviors which indicate illegal call activity.

T-Mobile has very well-defined processes for monitoring traffic volumes and pace to identify potential robocall/fraudulent activity.

Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Really Communications 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.

Really Communications uses a third-party vendor for its analytics - Telgoo5.

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

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

Blocking

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

Telgoo5 systems have the most recent usage data along with tools Really Communications can use to suspend, block, and prevent the activities from continuing.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Really Communications 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, Really Communications 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 Chieu Phan

I, Chieu Phan, Controller of Really Comm, do hereby certify, under penalty of perjury, the following:

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

Really Communications, Inc.
4809 Red Bluff Rd
Austin, TX 78702
- (3) Really Communications has no other business names in use.
- (4) Really Communications has not previously used any other business name.
- (5) The following persons/entities are Really Communications' directors/more than 10% owners: Adam Lyons and Polychain Ventures. Neither of them have had their license 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) Really Communications' role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) Really Communications has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) Really Communications is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) Really Communications does not have an operating company number and is not required to have one.



Chieu Phan

