

OMNETWORKS



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1930 5th ST Suite C
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2025-02-10

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Om Networks RoboCall Mitigation Plan REVISED

Dear Commissioners:

We are responding to the FCC requirements that all Voice Providers and Resellers, no matter what size to submit a Robocall Mitigation Plan. We have read the Rulemaking, agree with the spirit of the rulemaking to get all voice providers involved to tackle the chronic problem of robocalling in our networks. As we are a very small company, we do not have any legal representation or counseling in this matter, but our management team has read the rulemakings and will share what we believe are the “reasonable steps” our company takes to dress this very real problem. We welcome any feedback or requested adjustments to these plans.

INTRODUCTION:

Om Networks is a very small family owned Internet Service Provider (ISP) based in Davis California with 4 employees. We primarily resell Internet circuits from larger carriers, but do have a small amount of facilities based Fiber Optic and Fixed Wireless infrastructure. We have been a tiny community ISP for 28 years, do not have CLEC status nor provide regulated wireline voice. We began a

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relationship with Flowroute, a BCM One Cloud Communications LLC company, www.flowroute.com in about 2018 to provide VoIP to our Internet Access customers who wanted to keep their Land Line number and instrument while getting our faster Internet Access packages. We work exclusively with Flowroute as a reseller with a de minimis VoIP offering exempt from 499-A filing.

Flowroute holds all our end user customer Direct Inward Dialing (DID) numbers. Om Networks takes one SIP trunk from them, and operates one software VoIP Phone Branch Exchange (PBX), with the open source FreePBX software. Om uses analog telephone adapters or VoIP phone instruments to connect end user phones to extensions in its FreePBX software instance for the origination and termination of calls going to and coming from the PSTN. Om has about 70 active VoIP customers, that it already sells Internet Access to, so has a good knowledge of, and awareness of its user base. Om Networks is filing its Robocall Mitigation Plan as a Small Voice Service Provider as it provides call origination and termination services through its own PBX instance and its configured and managed end user analog telephone adapters or VoIP phones.

REASONABLE STEPS TO MITIGATE ROBOCALL ORIGINATION VOICE SERVICE PROVIDER

1) **IP FIREWALL** Om Networks uses strict firewalling to control IP address access to its FreePBX software instance. Specifically, we block all access to it, with the exception of the IP addresses of Flowroute, for the SIP trunk, our management office, and our end user customer dynamic IP address block range. Customers with Static IP internet access which we manage, only have their private fixed IP address allowed. This step reasonably prevents unauthorized access to our platform to initiate robocalling. This SIP trunk to Flowroute uses authentication.

- Due to firewalling, the only voice origination traffic coming into Om Networks PBX comes from its own configured and managed devices that are deployed to the customer premises.
- So if robocalling were to occur it would have to be originated directly from one of these end user customer devices having the correct authenticating credentials.

- All this traffic is authenticated within Om Networks network, and industry standard reasonable precautions are taken in operating and securely managing the VoIP hardware used for call origination and termination.
- Attacker would need to both spoofed IP address, SIP host information and credentials to make an unauthorized access to robocall.

2) **STIR/SHAKEN** - Om Networks operates NO call switches nor interfaces with the PSTN or any foreign gateways, and solely resells Flowroute VoIP services. Om Networks does not operate or manage the necessary hardware to implement STIR/SHAKEN, while Flowroute does. Although we do use some hardware, and a software PBX that assigns DID's to extensions, we do not have the necessary call switch hardware to implement Caller ID Authentication. We have received assurances from a Senior Engineer that Flowroute has implemented STIR/SHAKEN, and since all our DID live with them, and they pass the call along other providers, Om Networks as per section 64.6304(b) is not required to implement STIR Shaken as it is not able to obtain an SPC token from Governance Authority as it is solely a de minimis VoIP reseller exempt from filing 499-A. We exclusively resell from a company, Flowroute, that does have the obligation, token and has implemented STIR/Shaken in its network.

- Om Networks as per section 64.6304(b) is exempt from section 64.6301 filing due to the fact that it does not operate the required hardware software to authenticate inbound call, not being able to have an SPC token as because de minimis status.
- Om Networks exclusively resells Flowroute, Inc which does comply with these obligations and holds the DID's.

3) **POLICIES/PROCEDURES:**

KNOW YOUR CUSTOMER -

Om Networks implemented new policies and procedures to mitigate robocalling from any of its end user customer endpoints. Management, researched, crafted, published and distributed an updated VoIP Terms and Conditions (T&C) policy to all its residential and business VoIP customers specifically prohibiting robocalling. We restricted our VoIP service offering further by only selling as an add on to

one of our residential or business Internet Services circuits, and not offering any VoIP services to the public at large. We updated our Acceptable Use Policy (AUP) to specifically list “robocalling” as an UNAUTHORIZED use of the service. Demonstrable violations of these policies will result in service termination. These policy and T&C updates were implemented May 1st 2024.

- Policy and contract updates inform end users that robocalling activities are prohibited and constitute a violation of Acceptable Use Policy and grounds for termination of services to that end user. Provides an enforcement mechanism to eliminate origination of robocalls.
- Tying VoIP to Internet Access services restricts our sales channel to focus solely on community and local area members that our staff has adequate and up to date contact information from our ISP Billing and OSS platforms.
- This relationship allows us to easily block and revoke connections to the VoIP PBX server should robocall violations occur from within our customer base.

KNOW YOUR UPSTREAM PROVIDER -

Om Networks utilizes Flowroute as its sole source of SIP trunks and DIDs for its ISP customers and uses no other upstream provider for VoIP services. The contact information for the company operating the Flowroute service is as follows:

COMPANY: BCM One Cloud Communications, LLC

LOCATION: 295 Madison Ave 5th Floor, New York, New York 10017

PRINCIPAL: Geoffrey Bloss CEO

CHAIRMAN: Douglas Fechter – dfecter@bcmone.com – 212.849.2202

OCN: 738J

STATE of INCORPORATION: Delaware

DOS ID: 6480770

CONTACT: +1 (855) 356-9768

EIN: 88-0740911

BCM One Cloud dba Flowroute is in good standing with the FCC in regards to robocalling and has no

record or enforcement action in the last two years. Flowroute maintains a STIR/SHAKEN implementation. Flowroute delivers inbound calls and connects outbound calls in the call chain. Flowroute delivers all calls for Om Networks customers over a single SIP trunk to Om Networks FreePBX server instance. Om Networks then delivers those calls over secured PJSIP connections directly to its end user customers at equipment configured, managed and located on Internet connections Om Networks provides. Flowroute receives all outbound calls from Om Networks customers over a single SIP trunk from Om Networks Free PBX server instance before checking them and passing them on to their destination.

Flowroute operates strategies to monitor outbound calls coming from Om Networks servers including complying with any ITG (INDUSTRY TRACEBACK GROUP) requests as well as SDC (SHORT DURATION CALL) analysis. Flowroute takes call spoofing very seriously, and should Flowroute receive any ITG requests that fall under Om Networks accounts DIDs, Om registered contact would be immediately contacted so that Om may take necessary corrective action, up to and including service suspension on the offending party. In addition, Flowroute performs SDC analysis (outbound calls lasting 7 seconds or less) on a weekly basis on all calls placed through its network. Repeated SDC from a DID is a good indicator of compromised VoIP services, and should it be originating from Om Networks, Om would be notified via email immediately so it could take prompt corrective action to identify and disable access to a compromised circuit. Om has never been provided with an ITG notice nor an SDC notice from Flowroute.

4) CALL RECORD ANALYSIS - In order to check for robocall origination from any of its end user customers, Om Networks has deployed a software script to capture, analyze and report on our wholesale provider furnished Call Detail Records (CDR) to look for any of our customer DID are making more than 4 outbound calls per minute, an industry standard metric of analysis of CDR to look for “robocall activity.” Use of this script will also allow Om Networks to comply with the requirement to furnish CDR records to law enforcement officials within 24 hours. This analysis is carried out on a biweekly basis, and has been implemented since May 1st 2024.

- A commitment to stopping robocalling by apply staff resources to research and develop tools to analyze Flowroute provided CDR to detect likely robocalling.
- Staff time allocated for biweekly review of running tool and examining output to see if any positive activity is detected from any of the end user devices. Staff time informing, researching, suspending suspected circuits doing unauthorized robocalling.
- Upon request, tool can be run and accompanying CDR from Flowroute will be provided to properly executed Law Enforcement Agency inquiries within 24 hours in .csv format.

5) **CONCLUSION** - We believe that taken in aggregate steps 1, 3 & 4 represent a significant and effective strategy to mitigate illegal robocalling originating from Om Networks VoIP customer end users, or software VoIP PBX. Om Networks will remain vigilant for such activities in an ongoing basis and remains available, and take such actions as it deems necessary to suspend or disconnect devices originating unauthorized robocalling. We believes the strategies outlined furthers the goals of the Commission to reduce and eliminate calls and our de minimis status exempts our company from further STIR/SHAKEN implementation.

LAW ENFORCEMENT and CERTIFICATIONS

Om Networks, is not, nor ever has been subject to enforcement action in regards to “robocalling” nor has ever been notified that any robocalling is associated with any of our end user customers. Om Networks is making this revised filing in the Robocall Mitigation Database (RMD), and certifies it has never been barred from participation in the RMD.

Om Networks certifies in the last two years it has never “been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing,” Om Networks is filing to correct a deficient Robocall

Mitigation Database certification or mitigation program description.”

LAW ENFORCEMENT and FCC CONTACT for OM NETWORKS:

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OPERATING COMPANY NUMBER (OCN) - Om Networks does not possess an OCN, nor an SPC token, and has not investigated or pursued caller ID authentication at this time.

This completes Om Network's Robocall Mitigation Plan developed by its senior leadership team, based on a reading of FCC rules on the topic of Robocalls and the series of proceedings, rulemakings and orders. This was after a brief preparatory period when we were first alerted to these requirements just weeks prior, by reading the trade press. Should a further plan or any more specificity, or if the FCC believes any of our interpretation to be incorrect or wishes any supporting documentation please contact myself above.

Thank you

Robert Nickerson

On Behalf of, Om Networks

2025-02-15