

## **Robocall Mitigation Plan**

Faster Cajun LLC is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

Faster Cajun LLC purchases origination, termination, and hosted-switch access from IronSIP LLC dba SolidPhone Communications (FRN 0031034226) ("Provider") who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to Faster Cajun LLC.

### **Know Your Customer**

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). This includes securing documentation of a customer's authority to use a TN when a customer requests porting of an outside number.

### **International Subscribers**

Faster Cajun LLC does not sell origination or termination services to subscribers outside of the United States.

### **Terms of Service Policy**

Faster Cajun LLC maintains a Terms of Service ("TOS") Policy and Agreement that is posted on the company's website. This Agreement applies to all Faster Cajun customers who purchase any products or services from the company including VoIP telephone service. This Agreement provides a list of prohibited activities and states that no user should:

- undertake, plan, encourage, assist, or accomplish any unlawful, deceptive, or fraudulent activity or purpose. This includes, but is not limited to conduct which infringes the intellectual property rights of any person or entity, or which in any way constitutes or encourages conduct that would constitute a criminal offense, or otherwise violate any local, state, federal, or international law, order, or regulation;
- use auto-dialers or predictive-dialing to dial sequentially, including rapid dialing or data pumping for the purpose of generating revenue directly or indirectly;
- violate any of the federal, state, or local telemarketing regulations including but not limited to the Telephone Consumer Protection Act of 1991 ("TCPA"), the Telemarketing Sales Rules ("TSR"), the Junk Fax Prevention Act of 2005, and Truth in Caller ID Act of 2009;
- send unsolicited calls, messaging, e-mailings (including, without limitation, commercial advertising and informational announcements) if such unsolicited activities could reasonably be expected to or do in fact provoke complaints;
- utilize any form of Robocalling as defined by the Federal Trade Commission's Telephone Sales rule (TSR) that are unlawful;
- use of Service for the purpose of originating spam and/or illegal robo-dialing and Caller ID spoofing;

- use any unlawful form of calling utilizing pre-recorded audio or non-live-human communications;
- participate in continuous or extensive chat line or conference call;
- use an open telephone line as a monitoring, intercom, or similar service;
- fail to monitor outbound call campaigns to minimize complaints which may be generated by repetitive and/or continuous messaging or calling to the same destination or number within a short period of time;
- use Services to record or monitor a phone call or other communication without securing consent from the call participants as required by applicable federal and state laws (including, as applicable, California's Invasion of Privacy Act and similar laws);
- use extensive call forwarding or use of call forwarding or conferencing features to act as a bridge to chat lines or other conferencing facility;
- operate a business (including a home-based business, a non-profit business, governmental or any other enterprise) under a residential service account;
- operate a call center or conference line;
- transmit or receive broadcasts over teleconferencing facilities or other means;
- transmit or receipt of recorded material;
- participate in any relevant prohibited uses in our company's Terms of Service (ToS).

### **Traceback Requests**

Faster Cajun LLC is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Provider, and the industry traceback consortium. Furthermore, Faster Cajun LLC is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Faster Cajun LLC's service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to [compliance@fastercajun.com](mailto:compliance@fastercajun.com) for immediate processing by Faster Cajun LLC.

### **Telephone Number Validation**

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by Faster Cajun LLC or our Provider, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to Faster Cajun LLC of authorization to use a TN, documentation will be provided to Provider so that they can attest calls originated with these TNs.

### **Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns**

Our Provider IronSIP LLC uses Peering Hub's solution to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Provider if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Provider will immediately ask Faster Cajun LLC to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Faster Cajun LLC or Provider determines that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

### **Examples of calling patterns monitored**

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period

- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

#### **STIR/SHAKEN Implementation Timeline**

Provider has committed to Faster Cajun LLC Provider has confirmed to Faster Cajun LLC that it is currently authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on our network.