

Robocall Mitigation Plan

Business Information

NumberBarn, LLC
2510 S Escondido Blvd.
Escondido, CA 92025

Contact Information

Matthew Veling
CEO
760-877-8759
mveling@numberbarn.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

NumberBarn, LLC ("NumberBarn") 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, NumberBarn has fully implemented STIR/SHAKEN. In compliance with the R&O, NumberBarn submits this RMP and certification.

Know Your Customer ("KYC")

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

New Customer Screening:

NumberBarn ports existing numbers to _____ networks and only originates or terminates calls with Tier 1 carriers, each of whom has its strategies.

NumberBarn implements the following steps to quickly detect and terminate any subscribers that use NumberBarn's network to initiate illegal robocalls:

1. Monitor for traffic congestion or variations in call volume made from a customer or endpoint.
2. Immediately react to any complaints from upstream carriers by investigating and blocking calls from a customer found to be in violation.
3. Detect fraudulent patterns during signup, and monitor for non-human call volumes.
4. Throttle abuse and delete fraudulent accounts after that.

NumberBarn, LLC requires all users of its services to comply with applicable laws prohibiting illegal robocalling and providing for blocking or termination of services for those that breach such provisions.

New NumberBarn subscribers must provide a name, telephone number, email address, and a valid postal address. Subscribers putting money onto the NumberBarn platform ("platform"), a requirement in order to place outbound PSTN calls, must also provide their credit card number and associated information. Customers may only set caller ID on outbound calls from their list of assigned TNs. There are restrictions on amount & frequency of payments are implemented by NumberBarn's payment provider.

Active Customers:

NumberBarn, LLC monitors calling activity using analytics to automatically flag and shutdown calling patterns indicative of robocalls, including both toll fraud and calling patterns that violate our terms of service. Our customers have a rate limit, and internal alarms are triggered if call limits are reached.

NumberBarn, LLC will block services to a customer if it determines that the customer is using the services for any illegal activities, including robocalling. Additionally, NumberBarn will terminate a customer's service if the violation is determined to be intentional.

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, NumberBarn provides the following information concerning its upstream voice service carriers.

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

- 1)
- 2)

NumberBarn has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to NumberBarn, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to NumberBarn. NumberBarn 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")

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

- Subscriber shall not use the Services to create or distribute any images, sounds, messages or other materials, which are obscene, harassing, racist, malicious, fraudulent infringing or libelous, nor use the Services for any activity that may be considered or are unethical, immoral, violative of any third party's rights, or illegal.
- Subscriber will abide by all rules, regulations, procedures and policies of NumberBarn and any policies of the networks connected to the Services.
- Subscriber agrees to abide by all applicable local, state, national, foreign and international laws and regulations and is solely responsible for all acts or omissions that occur under Subscriber's account or password, including the content of Subscriber's transmissions through the Service. By way of example, and not as a limitation, Subscriber agrees not to:
 - Use the Service in connection with chain letters, junk email, voice mail, faxes, spamming or any duplicative or unsolicited messages (commercial or otherwise);
 - Harvest or otherwise collect information about others, including email addresses, without their consent;
 - Create a false identity or forged email address or header, or otherwise attempt to mislead others as to the identity of the sender or the origin of the message;
 - Transmit through the Service unlawful, harassing, libelous, abusive, threatening, harmful, vulgar, obscene or otherwise objectionable material of any kind or nature;
 - Transmit any material that may infringe the intellectual property rights or other rights of third parties, including trademark, copyright or right of publicity;
 - Transmit any material that contains viruses, trojan horses, worms, time bombs, cancelbots, or any other harmful or deleterious programs;
 - Violate any U.S. or foreign law regarding the transmission of technical data or software exported through the Service;

- Interfere with or disrupt networks connected to the Services or violate the regulations, policies or procedures of such networks;
- Attempt to gain unauthorized access to the Services, other accounts, computer systems or networks connected to the Service, through password mining or any other means;
- Interfere with another member's use and enjoyment of the Services or another entity's use and enjoyment of similar services.

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 NumberBarn receives notice that the Customer's outbound calls through our platform are deemed to be spam, NumberBarn has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

NumberBarn 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 NumberBarn's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, NumberBarn's risk prevention team is alerted, which 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.

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

We have various systems that monitor calling activity for robocalls, but in the case that these are not detected, requests to compliance@numberbarn.com will be processed and investigated manually.

Blocking

NumberBarn is DNO compliant and will promptly respond to Do Not Originate requests it receives from the ITG. NumberBarn has mechanisms to automatically block suspicious calls using internal analytics. The software NumberBarn uses automatically blocks suspicious dialing patterns, volumes, and destinations using a custom algorithm that is maintained in-house. If NumberBarn’s monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, NumberBarn will take appropriate action which may include suspending or terminating the subscriber’s use of NumberBarn’s network. NumberBarn 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. DNO requests received at compliance@numberbarn.com will be processed per ITG policy.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. NumberBarn 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, NumberBarn 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 Matthew Veling

I, Matthew Veling, CEO of NumberBarn, do hereby certify, under penalty of perjury, the following:

(1) NumberBarn has fully implemented STIR/SHAKEN in the IP portions of its network.

(1) NumberBarn's Business name and primary address are as follows:

NumberBarn, LLC
2510 S Escondido Blvd.
Escondido, CA 92025

NumberBarn has no other business names in use.

(2) NumberBarn (and dba Chava/String) has not previously used any other business name.

(3) 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.

(4) NumberBarn, LLC is a single-member LLC of which _____ holds all the shares.
_____ has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.

(5) NumberBarn's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

(6) NumberBarn has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

(7) NumberBarn is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

(8) NumberBarn's Operating Company Number is 658J.

Matthew Veling