

Robocall Mitigation Plan

Business Information

EK Solutions Group, LLC ("EK Solutions Group")
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Little Rock, Arkansas 72223

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

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

EK Solutions Group's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

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, EK Solutions Group provides the following information concerning its upstream voice service carrier.

EK Solutions Group has one upstream provider from which it receives voice traffic:

PayG, LLC dba Skyswitch
295 Madison Ave
FL 5
New York NY 10017
Jennifer Nading
jnading@skyswitch.com

EK Solutions Group has a master service agreement with its upstream provider and has received assurances in writing from its officials it has, and will continue to, sign calls transmitted to EK Solutions Group, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to EK Solutions Group. EK Solutions Group 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")

EK Solutions Group maintains an AUP that subscribers must sign before being permitted to use EK Solutions Group's network. Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using EK Solutions Group's service to engage in or in connection with fraudulent activities.

EK Solutions Group's contractual terms with subscribers specify that EK Solutions Group may take action up to suspension or termination of service for violation of the AUP.

Analytics for Monitoring Traffic

EK Solutions Group works with its upstream provider to identify behaviors which indicate illegal call 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).

No third parties are involved in deploying traffic analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, EK Solutions Group 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.

Because EK Solutions Group does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in EK Solutions Group's analytics.

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

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

Blocking

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

Plan Updates

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

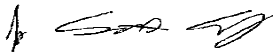
In the event of any material change to this plan, EK Solutions Group will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update. **EK Solutions Group recertifies that it has reviewed the contents of this plan and its current filing RMD filing and confirms that all the information therein is current and complete as of March 1, 2026 and the date of this filing.**

Certification of Scott Self

I, Scott Self, General Manager of EK Solutions Group, LLC, do hereby certify, under penalty of perjury, the following:

- (1) EK Solutions Group, 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) EK Solutions Group's Business name and primary address are as follows:

EK Solutions Group, LLC
6311 Ranch Dr
Little Rock, Arkansas 72223
- (3) EK Solutions Group has no other business names in use.
- (4) EK Solutions Group has not previously used any other business name.
- (5) The following persons own more than 10% of EK Solutions Group each or are EK Solutions Group's directors: Scott Self, Chuck Erwin, Steven Keith.
- (6) None of the persons/entities in item 5 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (7) 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.
- (8) EK Solutions Group's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (9) EK Solutions Group has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (10) EK Solutions Group is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) EK Solutions Group does not have an OCN.



Scott Self