

Robocall Mitigation Plan

Business 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

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

ICE MT'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); and
- nature of the customer's business.

External Facing Services Policy ("EFSP")

ICE MT maintains an EFSP that subscribers must agree to before being permitted to use ICE MT's software and services. Among other things, the EFSP 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 ICE MT's service to engage in or in connection with fraudulent activities.

ICE MT's contractual terms with subscribers specify that ICE MT may take action up to suspension or termination of service for violation of the EFSP.

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

Company has one upstream provider from which it receives voice traffic:

- 1) Twilio Inc.
101 Spear Street
First Floor
San Francisco, CA 94105

Giovanni Gallardo
Senior Enterprise Account Executive
(646) 939 - 0033
ggallardo@twilio.com

ICE MT has a master service agreement with Twilio, its upstream provider, and has received assurances in writing from Twilio officials that it has, and will continue to, sign calls transmitted to ICE MT, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to ICE MT. ICE MT and Twilio have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Mitigation During Service

ICE MT works with its Twilio 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

ICE MT works with its Twilio 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).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, ICE MT works with Twilio 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 ICE MT does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in ICE MT's analytics.

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

ICE MT works with Twilio to investigate suspicious activity found by the carrier's monitoring systems or reported to ICE MT by subscribers or third parties. The investigation could potentially result in opening a traceback request or with ICE MT contacting a subscriber to correct improper use of the

applicable platform, or, if the subscriber does not respond or comply, to notify Twilio to block their use of the platform.

For all new and renegotiated ICE MT contracts governing the transport of voice calls, ICE MT will endeavor to contractually require ICE MT's subscribers to cooperate in traceback investigations by identifying the Twilio from which the suspected illegal robocall entered our network.

Blocking

ICE MT will implement Do Not Originate requests it receives from the ITG. ICE MT's Twilio has mechanisms to automatically block suspicious calls using internal analytics. If ICE MT and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, ICE MT will take appropriate action which may include suspending or terminating the subscriber's use of ICE MT's service. ICE MT 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. ICE MT will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

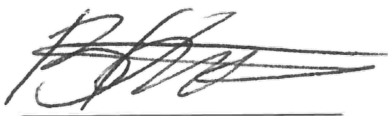
In the event of any material change to this plan, ICE MT will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Boris Kogan

I, Boris Kogan, General Counsel of ICE MT, do hereby certify, under penalty of perjury, the following:

- (1) ICE MT, 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) ICE MT's Business name and primary address are as follows:

ICE Mortgage Technology, Inc.
4420 Rosewood Drive, Suite 500
Pleasanton, CA 94588
- (3) ICE MT is an operating division of Intercontinental Exchange, Inc. (NYSE: ICE) and is affiliated with BK LLC, which is separately filing a robocalls mitigation plan. It offers a number of products and services under various brands, including the Encompass, Velocify, MERS and Simplifile brands. ICE MT has no other business names in use except as discussed herein.
- (4) ICE MT was previously branded as Ellie Mae and changed its name in December 2021. Except for this name change, ICE MT has not previously used any other business name.
- (5) 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.
- (6) ICE MT's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (7) ICE MT has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (8) ICE MT is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (9) ICE MT's does not have, and is not required to have, a company operator number, but will obtain one if required by the Commission.



Boris Kogan

ALL SUBSIDIARIES ARE 100% WHOLLY CONTROLLED UNLESS OTHERWISE INDICATED

