

Robocall Mitigation Plan

Business Information

Medicus IT, LLC
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Contact Information

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Overview

In the Commission's 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;
- "know your upstream provider";
- ownership information;
- 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

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

Medicus provides service only to subscribers who have other services (*i.e.*, non-voice) with Medicus. Accordingly, before providing voice service, Medicus has already collected information such as: (a) name; (b) address; (c) nature of a subscriber's business; (d) contact name and phone number; and (e) payment (*e.g.*, credit card) information. Subscribers can only post outgoing caller ID for numbers they own. Medicus has a strict policy against spoofing and will not permit it.

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, Medicus provides the following information concerning its upstream voice service carriers

Telnyx
311 W. Superior St.
Ste. 504
Chicago, IL 60654
Mark Morse
mark@telnyx.com

SkySwitch
751 Arbor Way
Blue Bell, PA 19422
Eric Hernaez
ehernaez@skyswitch.com

thinQ by Commio
5420 Wade Park Blvd.
Ste. 100
Raleigh, NC 27607
Aaron Leon
aaron@commio.com

Vitelity (parent company Inteliquent)
317 Inverness Way South
Ste. 140
Englewood, CO 80112
Stacy Graham
stacy.graham@sinch.com

To the extent that Medicus were to receive information from law enforcement or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. While Medicus' agreements with its upstream providers contain no provisions specific to robocall mitigation, Medicus has received assurances from them that they have, and will continue to, sign calls transmitted to Medicus, and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic.

Analytics for Monitoring Traffic

Medicus 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 Medicus' analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Medicus 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.

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

Medicus works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to Medicus by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Medicus 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.

Blocking

Medicus will implement Do Not Originate requests it receives from the ITG. Medicus' upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If Medicus and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Medicus will take appropriate action which may include suspending or terminating the subscriber's use of Medicus service. Medicus will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, the FCC, and the ITG; as well as documenting requests & actions taken in response thereto. Medicus commits to responding within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Medicus 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, Medicus 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 Jesse Sanders

I, Jesse Sanders, CFO of Abacus Group LLC (an affiliated group of Medicus IT, LLC ("Medicus")) and Mach 1 HoldCo (Medicus's parent company), do hereby certify, under penalty of perjury, the following:

- a. Medicus, 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.
- b. Medicus' Business name and primary address are as follows:

Medicus IT, LLC
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Suite 150
Alpharetta, GA 30022

- c. Medicus has no other business names in use.
- d. Medicus has not previously used any other business name.
- e. 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.
- f. Medicus' role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- g. Medicus has the following parent companies: Badge 21 Midco Holdings LLC, Mach 1 Intermediate, LLC, Mach 1 TopCo, LLC, and Mach 1 HoldCo, LLC. Medicus has the following affiliates: Abacus Information Technology, LLC, Abacus Holdings II, LLC, and Abacus Holdings I, LLC. None of them have had any licenses revoked by the FCC.
- h. Medicus has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Medicus is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Medicus is not required to, and does not have, an operating company number.

Jesse Sanders

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03/11/2026

Date: _____