

Robocall Mitigation Plan

Business Information

Aunalytics Inc.
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South Bend, IN 46601

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

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

Aunalytics' voice customers are largely connected to us via Fiber to their businesses. The few customers that are connected to us over the Internet are either branch offices of businesses connected to us via Fiber or are subscribers of several other services. Caller ID is configured by Aunalytics internal resources and not the customer and are configured to either match the Direct Inward Dial number of the subscriber or the main number of the 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, Aunalytics provides the following information concerning its upstream voice service carriers:

ThinQ/Commio
5420 Wade Park Blvd.
Suite 100
Raleigh, NC 27607
Ryan Garrett
rgarrett@commio.com

Bandwidth.com
900 Main Campus Dr
Suite 500
Raleigh NC 27606
John Anthony
jwanthony@bandwidth.com

To the extent that Aunalytics 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 Aunalytics' agreements with its upstream providers contain no provisions specific to robocall mitigation, Aunalytics has received assurances from those providers that they have and will continue to, sign calls transmitted to Aunalytics, and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic.

Analytics for Monitoring Traffic

Aunalytics works with its upstream providers to identify behaviors which indicate illegal call activity. Subscribers must specifically request the ability to place outbound calls and supply their use case before outbound dialing is enabled. Analytics reviews outbound call logs and analytics regularly to monitor for any possible abuse.

No third parties are involved in deploying Aunalytics' analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Aunalytics works with its upstream providers to follow defined procedures on investigating such subscribers. Aunalytics conducts investigations via Call Detail Records and our Call Analytics system.

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

Blocking

Aunalytics will implement Do Not Originate requests it receives from the ITG. Aunalytics' upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If Aunalytics and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, Aunalytics will take appropriate action which may include suspending or terminating the subscriber's use of Aunalytics' service. Aunalytics 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).

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Aunalytics 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, Aunalytics 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 Chad Varney

I, Chad Varney, Director of Cloud Network and Telephony of Aunalytics Inc. ("Aunalytics"), do hereby certify, under penalty of perjury, the following:

- a. Aunalytics, 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. Aunalytics' business name and primary address are as follows:

Aunalytics Inc.
460 Stull St. # 100
South Bend, IN 46601

- c. Aunalytics has no other business names in use.
- d. Aunalytics 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. Aunalytics' role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- g. The persons that have 10% or more ownership interest in Aunalytics are: Tracy D. Graham, Richard F. Carlton, John Affleck-Graves, Hamender K. Agarwal, Raj Chaudhary, Christopher J. Murphy III, and Robert Wozny. Aunalytics has no affiliates or subsidiaries.
- h. Aunalytics has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Aunalytics is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Aunalytics is not required to, and does not have, an operating company number.

Chad Varney

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