

Robocall Mitigation Plan

Business Information

Airosurf Communications Inc.
3609 Steven Ct.
Edmund, OK 73013

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, outlines "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

Airosurf Communications, Inc. ("Airosurf") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. Because Airosurf lacks control of the infrastructure necessary to implement STIR/SHAKEN, it is not required to be STIR/SHAKEN compliant. In compliance with the R&O, Airosurf submits this RMP and certification.

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 Airosurf in which it transmits, originates, and/or terminates calls based on behalf of the subscriber.

Airosurf's KYC program requires subscribers to abide by its Terms of Service and confirms same by mandating that they accept the Terms of Service before commencing

service. Airosurf confirms a subscriber's identity by vetting a subscriber directly. The vetting process includes collecting such information such as:

- physical location;
- contact person(s);
- phone number;
- email address
- place of subscriber's primary use of Airosurf's service.

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

Airosurf's upstream provider is:

Alianza Inc.
1064 S. North County Blvd.
Pleasant Grove, UT 84062
Michell Andrews
385.233.0177
michelle.andrews@alianza.com

Airosurf has no contractual provisions with its upstream carrier concerning robocall mitigation, but Airosurf and its upstream provider work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Airosurf maintains an AUP that subscribers must accept before being permitted to use Airosurf's network. See <https://airosurf.com/legal/>

Analytics for Monitoring Traffic

Airosurf works with its upstream carrier to analyze high-volume voice traffic to identify and monitor patterns consistent with robocalls. The upstream carrier's system alerts it to calling patterns with unusual spikes, traffic patterns, and related matters.

If a calling pattern is detected that is consistent with illegal robocalls, Airosurf and its upstream provider will identify the party that is using its network to transmit 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 Airosurf's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Airosurf is alerted by its upstream carrier, and follows 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; and
- ⌚ contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

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

Blocking

Airosurf works with its upstream carrier to abide any Do Not Originate requests it receives from the ITG. Airosurf will cooperate with Investigative Bodies (provide a single point of contact) to address traceback requests from law enforcement and regulatory entities such as state attorneys general, the FCC, and 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. Airosurf 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, Airosurf 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 Sam Walcher

I, Sam Walcher, General Manager of Airosurf Communications Inc. ("Airosurf") do hereby certify, under penalty of perjury, the following:

- a. Airosurf is not required to implement STIR/SHAKEN, due to its lack of control over the necessary infrastructure.
- b. Airosurf's business name and primary address are as follows:

Airosurf Communications Inc.
3609 Steven Ct.
Edmund, OK 73013

- c. Airosurf has no other business names in use.
- d. Airosurf 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. Airosurf is solely owned by Wallace Walcher. It has no parent companies or subsidiaries.
- g. Airosurf's role in the call chain is that of a voice service provider with no STIR/SHAKEN implementation obligations.
- h. Airosurf is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Airosurf has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Airosurf is not required to, and does not have, an Operator Code Number.

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