

Robocall Mitigation Program

2024-04-16



Foreword

Pebbletree Ltd, trading as Soho66, is a communications services provider based in the United Kingdom, servicing the small to medium business market.

This document sets out Pebbletree's current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating from our service.

Preventing robocalling is an ongoing process, however we believe the measures currently implemented (and set out in this document) constitute "reasonable steps". In addition to these steps, we commit to responding to Traceback requests as when they arise.

STIR/SHAKEN

As of April 16th 2024, we do not implement STIR/SHAKEN on any portion of our network. There are three reasons for this:

1. Over 95% of calls placed by our customers are to the United Kingdom, and STIR/SHAKEN has little-to-no adoption domestically. Of those customers calling the USA, 99% do so presenting a UK number.
2. We have no direct contact with USA carriers, and all calls destined for the USA are passed through other carriers within the UK. None of which are participants in the STIR/SHAKEN initiative (however they are FCC registered and run robocall mitigation programs).
3. OFCOM already mandates similar know-your-customer requirements that serve as the basis for a Robocall Mitigation Program.

Customer Vetting

As required by OFCOM, we implement a number of initial checks for all new customers, in addition to regular checks for existing customers. These checks apply regardless to all customers, not just those contacting the USA.

In regards to robocall mitigation, we perform the following checks and apply the following limitations:

- All new customer account details (name, email, company name, assumed geographic location) are checked by a human. Accounts with spurious details are either disabled immediately, or contacted with suspension if a response is not received.
- Customers adding a significant volume of credit to their account (which would allow them to perform robocalling) are flagged for manual review and contacted.
- Customers adding credit through a non-UK debit/credit card are flagged for manual review and contacted.
- All customers by default have low limits set on non-UK calls. This limit can only be changed by contacting our support team and providing justification for the request.
- Customers seeking to present non-UK numbers, regardless of destination, must contact us directly. In addition to all necessary information required by local regulators to subscribe to the number, we also confirm the nature of the customer's business and their likely pattern of calling.
- Larger businesses seeking our services are handled on a one-to-one basis, with contracts in place that specify appropriate (non-robocalling) usage of our services.
- Customers requesting we present numbers we have not been suballocated are turned away.

Call Monitoring

All call traffic is monitored and inspected to ensure it conforms to typical calling patterns on our service. This monitoring runs 24/7, with automatic alerts sent to on-call engineers when malicious behaviour is detected. Our upstream carriers apply similar monitoring.

Accounts flagged by monitoring within working hours are contacted by telephone immediately. Accounts flagged outside of working hours are handled by the on-call engineer, who will typically suspend the account (and ability to place calls) until the customer can be contacted the next working day.

Traceback

We commit to cooperate with the FCC, law enforcement, and the ITG on all traceback requests. As part of our obligations to OFCOM as a communications service provider, we maintain a record of all calls (CDRs) made and received by our customers for no less than 6 years. These records will be used to service Traceback requests.

We maintain an all-hours contact point for use by UK law enforcement agencies and our upstream carriers (when dealing with suspect calling patterns). Currently, all carriers used for USA-bound traffic are registered with the FCC and Robocalls Mitigation Database, and have their own robocall mitigation program.

This contact address was already operating as “respond-within-24-hours”, and has had its scope increased to include traceback requests.

Patrick McDonough

Infrastructure Manager, Pebbletree Ltd

Telephone: (+44) 33 33 443 443

Email: support@soho66.co.uk