

ADVANCED TECHNOLOGY GROUP

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Advanced Technology Group (“ATG”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures ATG has in place to mitigate illegal robocalls. ATG may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

ATG has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed from the Database by the Commission.

ATG has not been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with ATG’s findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

STIR/SHAKEN IMPLEMENTATION

ATG will comply fully with all conditions set forth in the FCC’S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission’s rules and policies more generally.

ATG is implementing STIR/SHAKEN through use of the TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies the FCC’s STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

ATG has implemented this solution in the IP portions of its network by June 30, 2023. And my traffic is fully attested.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the ATG has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. The ATG will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the ATG determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. ATG is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and ATG has not received information suggesting that robocalls are originated on its network. Therefore, ATG does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: ATG conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The ATG confirms the customer's service address for all customers.

- ATG verifies customer's business reputation prior to providing service.
- ATG verifies customer information when contracts are renewed or services are added.
- ATG verifies the customer's identity and their right to use the telephone number presented on calls.
- ATG has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Upstream Providers: Direct IP Intermediate Carrier Due Diligence: ATG takes appropriate steps to know the immediate service provider to ensure that the immediate upstream provider is not using it to carry or process a high volume of illegal traffic.

The Company only uses upstream providers that are listed in the RMD and maintains a robust fraud detection system. In addition, any upstream provider must possess the ability to connect, in real time, with the Company so that issues with calls being processed by the Company can be immediately identified and addressed.

Two of the Company's upstream providers are:

1. Bandwidth
2230 Bandmate Way
Raleigh, NC 27607
800-808-5150
www.bandwidth.com
support@bandwidth.com
2. AT&T
PO Box 5019
Carol Stream, IL 60197
855-277-8696
www.businesscenter.att.com
julian.williams.1@att.com

Current & Ongoing Measures to Prevent or Avoid the Origination of Illegal Robocalls

- ATG has in place an enforceable terms of use and/or an acceptable use policy. ATG also has in place policies designed to detect and prevent fraudulent traffic on its network.
- ATG uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If ATG has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, ATG can suspend and/or terminate service to the customer.
- ATG verifies that the direct intermediate carriers that are used by ATG are in the FCC RMD and does not accept traffic from intermediate carriers who are not in the RMD.
- ATG blocks the following types of calls by default with such calls that are originating from invalid numbers per FCC Order 2017 Call Blocking Order and calls from DNO numbers as per FCC Order 2017 Call Blocking Order.
- ATG also blocks the following types of calls:
 - ✓ Describe any blocking based on FCC safe harbors – analytics, network-based blocking, etc.
 - ✓ Describe any other blocking policies.
 - ✓ As an originating service provider and/or intermediate carrier that is immediately downstream from a bad actor, will block traffic from the bad actors when notified by the commission

Responding to Traceback Requests

- ATG has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- ATG will respond within 24 hours of receipt of traceback request to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, ATG will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

ATG will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, ATG will:

- Respond to valid law enforcement requests;

- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

ATG has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. ATG is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

ATG primary place of business is:

1711 Central Avenue
Augusta, GA 30904
706-823-1449
Support@catg.com
Website: www.catg.com

Leaders of the ATG are:

Managing Member

Edwin B. Pollock, III
1711 Central Avenue
Augusta, GA 30904
706-733-0537
epollock@pollockcompany.com

Designated RMD Contact:

John Wable
1711 Central Avenue
Augusta, GA 30904
706-823-1449
Jwable@catg.com

MEASURES TO PREVENT ORIGATION OF ILLEGAL CALLS:

Know Your Customer:

ATG has a rigorous KYC policy for the in order to support the Business Customers that it sells and resells services to. ATG has an in-depth presales process where representatives of ATG work with the prospect or customer to understand all the unique factors of the Customer's business. Thie objective of this is twofold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

ATG performs a thorough reputation check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Not only does ATG have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between ATG and customers are governed by an MSA which specifically states the business Customer is not able to resell any services which the ATG resells and the services which are sold to the Customer are strictly for the Customers own internal use.

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.

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