

## **OzarksGo, LLC Robocall Mitigation Certification and Plan**

OzarksGo, LLC (OzarksGo) submits this certification pursuant to section 64.6305(d) of the Federal Communications Commission's (Commission's or FCC's) rules.

### **STIR/SHAKEN Implementation**

OzarksGo is a voice provider. OzarksGo lacks control over the network infrastructure necessary to implement STIR/SHAKEN and therefore has no STIR/SHAKEN implementation obligation.

### **Enforcement**

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

OzarksGo and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

OzarksGo has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

### **Traceback**

OzarksGo commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. OzarksGo will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

I, Steven Bandy, CTO for OzarksGo, submits this certification on behalf of OzarksGo, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.

 CTO Signature

## **Robocall Mitigation Program**

**Call Analytics:** As a reseller, OzarksGo relies on procedures, policies, and safeguards implemented by its underlying voice provider, Alianza, Inc. (“Alianza”), including Alianza’s Cloud Voice Platform, to ensure that OzarksGo’s residential and business voice service customers are sufficiently protected against robocall and spoofing activities. Alianza uses the competitive local exchange services of Bandwidth.com CLEC, LLC (“Bandwidth”).

Alianza prohibits the use of its network for illegal robocalls and it immediately suspends any offending accounts. To mitigate illegal outbound robocalling, the Alianza platform prevents users from “spoofing” CallerID (using a phone number as CallerID that they do not own), and account usage is monitored for spikes in usage, which are investigated.

As an additional service, Alianza also supports an integration with its Platform to utilize landline service from Telephone Science Corporation, d/b/a Nomorobo (“Nomorobo”). The service provided by Nomorobo, which OzarksGo is utilizing for its customers, uses the simultaneous ringing feature available on Alianza's phone system, which allows a user to have an incoming call ring at several numbers at the same time.

Nomorobo routes incoming calls to a second line and disconnects the call if the Nomorobo software detects that the call has been originated by a computer. The disconnection occurs before the user's phone rings. This feature is provided by Alianza at no extra charge to OzarksGo, and OzarksGo does not require its customers to pay any charge for the feature.

As noted above, OzarksGo relies on Alianza’s Platform, in conjunction with the efforts undertaken by Bandwidth, to take various steps, including monitoring OzarksGo’s outbound voice traffic in real time, to prevent the origination of illegal robocalls. Bandwidth explained in its Robocall Mitigation Plan submitted in the Commission’s Robocall Mitigation Database that has also implemented technical and operational processes and procedures that will detect and analyze the use of outbound voice services and traffic as a means of helping to determine when any illegal and inappropriate robocalling activity may be occurring.

If there is a reasonable basis to believe that a customer is originating illegal calls, OzarksGo will take action, consistent with our Acceptable Use Policy (AUP) and Global Terms and Conditions (T&C), including providing the customer with a warning, suspending or terminating the customer’s service, and/or reporting the misconduct to the appropriate authorities. The AUP and T&C include provisions requiring customers to comply with all applicable laws in connection with the customer’s use of our services. OzarksGo’s customers must agree to abide by the AUP and T&C.

**Know Your Customer:** As part of our standard operating procedures, we conduct due diligence on new and renewing voice Customers by collecting personal identifiable information. For business customers, we collect information concerning the company's name, address, physical location, contact information, and Federal Tax ID, where appropriate. With respect to residential customers, we verify customer name and address, physical service location, and contact information. All residential and business customers are only able to place calls originating from their own phone number. Caller ID and call records are reviewed when service is installed to verify legitimate caller ID information.

**Know-Your-Upstream Provider.** OzarksGo relies on Alianza's Know-Your-Upstream provider processes. In its Robocall Mitigation Plan, Alianza states: it has agreements with Tier-1 carrier service providers from which it facilitates the provision of carrier services and it has confirmed that these carriers are listed in the Robocall Mitigation Database. Alianza states that it enables its customers to contract directly with carrier service providers to enable the customers' use of Alianza's Cloud Communications Platform. Alianza has provided onboarding and fraud detection guidance to enable OzarksGo to comply with its obligation to prevent and mitigate illegal robocalling.

**Traceback:** OzarksGo will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.