

ECONOTEL

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Econotel Corp. “Econotel” 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 Econotel has in place to mitigate illegal robocalls. Econotel 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.

Econotel 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.

Econotel 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 Econotel’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

Econotel 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.

Econotel is implementing STIR/SHAKEN will have its own Operating Company Number (currently pending) and will use Transnexus Call Guardian. 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).

ROBOCALL MITIGATION PLAN

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

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

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

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

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

Direct IP Intermediate Carrier Due Diligence: Econotel 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.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- Econotel has in place enforceable terms of use and/or an acceptable use policy. Econotel also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Econotel uses analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If Econotel 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, Econotel can suspend and/or terminate service to the customer.
- Econotel verifies that the direct intermediate carriers that are used by Econotel are in the FCC RMD and does not accept traffic from intermediate carriers who are not in the RMD.
- Econotel 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.
- Fraud Detection: The Company has the ability to detect all forms of Robocalling spoofing, spam and other activity such as High Volume Short Duration ("HVSD") traffic which is an indicator of Robocalling and telemarketing fraud.
- Subscriber Notification: Caller ID Name override to warn subscribers of suspicious calls or if an ANI has been replaced or modified.

- In conjunction with Transnexus service and support, we constantly seek to implement other blocking strategies, as tools and methods advance such as Call Guardian and/or like or similar services provided by Transnexus.

Responding to Traceback Requests

- Econotel 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/>
- Econotel 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, Econotel 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

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

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

Econotel primary place of business is:

1820 N Corporate Lakes Blvd, Suite 110

Weston, FL 33326

Phone: (954) 644-5966

Website: www.virfon.com

Leaders of Econotel are:

CEO

Name: Javier E. Pinzon

Address: 1820 N Corporate Lakes Blvd, Suite 110

City, State, Zip Weston, FL 33326
Phone: (954) 644-6966 x 401
Email: jpinzon@virfon.com

CTO

Name Mauricio Gallego
Address 1820 N Corporate Lakes Blvd, Suite 110
City, State, Zip Weston, FL 33326
Phone: (954) 644-6966 x 406
Email: mgallego@virfon.com

Designated RMD Contact:

Name Mauricio Gallego
Address 1820 N Corporate Lakes Blvd, Suite 110
City, State, Zip Weston, FL 33326
Phone: (954) 644-6966 x 406
Email: us_compliance@virfon.com

MEASURES TO PREVENT ORIGINATION OF ILLEGAL CALLS:

Know Your Customer:

Econotel has a rigorous KYC policy for the in order to support the small Business Customers and also individual end user Customers who use the Company's PIN Free calling services. Therefore based on the nature of the call volume and traffic type the risk for illegal robocalling and any form of fraud related to telephony is minimal that it sells and resells services to. Econotel has an in-depth presales process where representatives of Econotel work with the prospect or customer to understand all the unique factors of the Customer's business. The 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.

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