

Business Information

Great America Networks Inc
1441 Branding Ave., Ste 200
Downers Grove, IL 60515

Contact Information

David Smith
Director of Production
312.432.5339
dsmith@btigroup.com

Overview

In the Commission's recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17- 97 (adopted March 16, 2023)* it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "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;
- 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

Great America Networks, Inc ("GAN") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. Great America Networks, Inc is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Great America Networks, Inc was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as Great America Networks, Inc now file RMPs. This document delineates Great America Networks, Inc 's RMP. Because Great America Networks, Inc does not have access to the necessary infrastructure, it relies on its upstream carriers to assist in robocall mitigation. As delineated herein, Great America Networks, Inc works closely with its upstream providers to carry out the required mitigation functions.

Know Your Customer

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 Great America Networks, Inc in which we transmit calls based on behalf of the subscriber by reselling service bought in bulk from our upstream providers.

New Subscribers

All new subscribers have their identity confirmed by Great America Networks, Inc by verifying who is using its voice services through collecting information such as physical customer location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business. All new subscriber activity is monitored as explained below.

Existing Subscribers

Great America Networks, Inc required updates of subscribers' information on all their orders. Each subscriber's identity is verified again to ensure the account is not compromised and is being used for its intended purpose.

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, Great America Networks, Inc provides the following information concerning its upstream voice service carriers.

Great America Networks, Inc has one upstream provider from which it receives voice traffic:

- 1) IntelPeer Cloud Communications
LLC 155 Bovet Rd.
Suite 405
San Mateo CA 94402
Vu Tran
vtran@intelepeer.com

Great America Networks, Inc has a master service agreement with its upstream provider and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to Great America Networks, Inc , and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Great America Networks, Inc . Great America Networks, Inc and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy

Great America Networks, Inc maintains an Acceptable Use Policy ("AUP") that subscribers must agree to before being permitted to use Great America Networks, Inc 's network. Among other things, this AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Great America Networks, Inc 's service to engage in or in connection with fraudulent activities.

Great America Networks, Inc 's AUP specifies that Great America Networks, Inc may take action, including suspension or termination of service, for violation of same.

Mitigation During Service

Great America Networks, Inc works with its upstream providers to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Great America Networks, Inc works with its upstream providers to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls); recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level);
- and anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Great America Networks, Inc works with its upstream providers to follow 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; verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Because Great America Networks, Inc does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Great America Networks, Inc 's analytics.

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

Great America Networks, Inc works with its upstream providers to investigate suspicious activity found by the carriers' monitoring systems or reported to Great America Networks, Inc by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Great America Networks, Inc contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream providers to block their use of the platform.

For all new and renegotiated Great America Networks, Inc contracts governing the transport of voice calls, Great America Networks, Inc will use best efforts to contractually require Great America Networks, Inc 's subscribers to cooperate in traceback investigations by identifying the upstream providers from which the suspected illegal robocall entered our network.

Blocking

Great America Networks, Inc will implement Do Not Originate requests it receives from the ITG. Great America Networks, Inc 's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If Great America Networks, Inc and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, Great America Networks, Inc will take appropriate action which may include suspending or terminating the subscriber's use of Great America Networks, Inc 's service. Great America Networks, Inc will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or the 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. Great America Networks, Inc will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

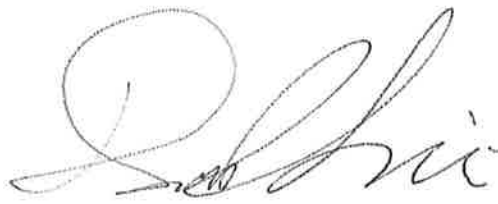
In the event of any material change to this plan, Great America Networks, Inc will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

I, David Smith, Director of Production of Great America Networks, Inc Technologies, LLC, do hereby certify, under penalty of perjury, the following:

- 1) Great America Networks, Inc ("GAN"), by virtue of its status as a "pure reseller" does not have the access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- 2) Great America Networks, Inc 's Business name and primary address are as follows:

Great America Networks
1441 Branding Ave., Ste 200
Downers Grove, IL 60515

- 3) Great America Networks, Inc has no other business names in use.
- 4) Great America Networks, Inc has not previously used any other business name.
- 5) Great America Networks, Inc has the following directors: Eric Brackett
- 6) Great America Networks, Inc had no parent company.
- 7) None of the persons/entities listed in item 6 above have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- 8) 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.
- 9) Great America Networks, Inc 's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- 10) Great America Networks, Inc has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- 11) Great America Networks, Inc is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- 12) Great America Networks, Inc is not required to, and does not have, an operator company number.



DAVID R. SMITH