

LBiSAT LLC RMP

As part of its Robocall Mitigation Database filing required under the FCC's *Sixth Caller ID Authentication Report and Order* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (Mar. 17, 2023)), this document describes LBiSAT LLC certifications and robocall mitigation plan to detect and prevent unlawful robocalls from originating on its network.

1. LBiSAT LLC corporate information

LBiSAT LLC. is a Utah corporation. Its primary address is provided within the Robocall Mitigation Database.

LBiSAT certifies it has not been prohibited from filing in the Robocall Mitigation Database and LBiSAT has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), LBiSAT has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, phone number, and email address are available within the Robocall Mitigation Database.

2. stir/shaken certification

LBiSAT hereby certifies that all voice traffic originating on its network is authenticated in compliance with applicable standards under 47 CFR § 64.6301.

3. know-your-upstream-provider procedures

LBiSAT has existing agreements with Tier-1 carrier service providers from which it facilitates the provision of carrier services to its service provider customers. LBiSAT has confirmed that each of those carriers are listed in the RMD. LBiSAT also enables its customers to contract directly with carrier service providers to enable those customers' use of LBiSAT's Cloud Communications Platform. In each case, LBiSAT has provided detailed onboarding and fraud detection guidance to require and enable its customers to comply with their obligations to prevent and mitigate illegal robocalling.

4. know-your-customer procedures

For the purposes of this robocall mitigation plan, LBiSAT's customers are regulated communications service providers with their own STIR/SHAKEN obligations. While LBiSAT's STIR/SHAKEN compliance efforts work hand-in-hand with its customers STIR/SHAKEN compliance efforts, each service provider customer must develop and file its own RMD plan under the *Sixth Order and Report*.

Upon the beginning of each customer relationship, LBiSAT's sales and customer success

teams engage in a discovery process with each potential customer to understand the customer's subscriber base and to educate those potential customers about the operation of LBiSAT's Cloud Communications Platform. During the discovery process, LBiSAT shares critical information about its fraud detection and prevention processes. That information remains available to each service provider after it transitions to become LBiSAT's customer. Finally, as part of its discovery process, LBiSAT also encourages potential customers to obtain third-party service from Telephone Science Corporation, dba Nomorobo, for additional robocall mitigation coverage.

5. contractual terms and other conditions

LBiSAT's customer agreements contain fair use and protection policies that allow LBiSAT to immediately terminate any services to any subscriber or device to prevent automated call blasting, mass calling events, and other fraudulent or illegal activity.

LBiSAT agreements with its underlying carrier services providers also include provisions requiring the parties' compliance with applicable robocall prevention and mitigation standards.

6. fraud detection and mitigation

LBiSAT has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. Through this fraud detection and mitigation process, LBiSAT then notifies individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Detailed information about this fraud detection and mitigation process is provided to each customer through LBiSAT's knowledge base and support resources. LBiSAT may take remedial action against any subscriber's account to prevent or remediate robocalling or other fraudulent activity. If LBiSAT takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

7. enforcement

LBiSAT promptly responds to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group. LBiSAT also cooperates with those entities and with its carrier partners to investigate and prevent any illegal robocallers from using LBiSAT's services to originate calls. LBiSAT employees engage directly with LBiSAT's customers to suspend or disable subscriber accounts identified as originating unlawful robocalls through LBiSAT's network.