

Date	On behalf of	Change Summary
Sept 2, 2024	France Telephony	Initial Version

Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The commission requires voice service providers to develop and implement a Robocall Mitigation Plan that:

- Details the reasonable steps taken to avoid originating illegal robocalls
- Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- Is filed in the Robocall Mitigation Database

This mitigation plan is submitted on behalf of France Telephony, Telephone Company based and is registered in France.

FTY is a Telecom company that provides a calling application to its clients (B to C).

This application is available on stores:

- Google Store: <https://play.google.com/store/apps/details?id=com.zeyi>
- Apple Store: <https://apps.apple.com/us/app/zeyi-virtual-numbers/id1669229422>

For call routing and voice and SMS traffic, FTY is partnering with a trusted provider, DIDWW (www.didww.com).

France Telephony will be referred to as FTY throughout this document.

Use of the application marketed by FTY (Zeyi)

To make a call or send a message, Zeyi users must go through the application. It is therefore impossible to make a call without using the application. Unless illegally circumventing the application, it is therefore impossible to do robocalling.

STIR/SHAKEN Compliance

FTY is partnering with a trusted provider to implement STIR/SHAKEN in its network: DIDWW.

DIDWW numbers, which are used as caller-ID will receive the highest A attestation level, while the 3rd party source numbers will be appended with B attestation level.

Consequently, the network of FTY is fully compliant with STIR/SHAKEN requirements.

References:

- RFC 8224. Defines how SIP Identity tokens are used to authenticate and verify the calling number in SIP signaling.
- RFC 8225. Defines a method for creating and validating a token that cryptographically verifies a calling number.
- RFC 8226. Describes the use of certificates in establishing authority over telephone numbers.
- RFC 7340. Resents the Secure Telephone Identity Revisited (STIR) problem statement outlining challenges that have led to unauthorized robocalling and other illegitimate activities.

For more information:

<https://doc.didww.com/voice/outbound-trunks/technical-data/stir-shaken.html#stir-shaken>

Network Monitoring

FTY is continuing development of custom software in house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling.

Additional capability is being added to the software which will automatically disable any subscriber associated with flagged call patterns.

FTY also uses call monitoring solutions provided by its partner (DIDWW).

General Prohibition Against Illegal Robocall

FTY end user services are subject to restrictions contained in its legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (TOS) requirements. TOS prohibit activities normally associated with Robocalling including, but not limited to:

- Providing altered, deceptive, or false information about the identity of the sender of the origin of a message or phone call,
- Violating any applicable local, state or federal laws.

In addition, FTY is updating its TOS to expressly reference the prohibition on robocalling.

FTY's end users are notified that FTY may take action up to suspension or termination of services for violation of TOS.

Know Your Customer, KYC

FTY utilizes the Mitigation technique of KYC.

Traceback and Enforcement Cooperation

FTY will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls.

FTY will dedicate sufficient resources to provide prompt and complete responses to traceback requests.