

Hiatti Carrier Services | Robocall Mitigation Plan

Overview

Hiatti Carrier Services LLC ("Hiatti Carrier Services") is dedicated to taking proactive measures to prevent the transmission of illegal robocall traffic. This plan demonstrates our compliance with the requirements established by the Federal Communications Commission (FCC) under the TRACED Act and its subsequent Reports and Orders. Hiatti Carrier Services commits to staying at the forefront of industry efforts, working closely with other service providers, industry groups, and third-party solution providers to combat illegal robocalls.

Related Entities Covered

Hiatti Carrier Services LLC provides services exclusively to Hiatti Telecommunications LLC, which is the consumer-facing entity for all Hiatti services.

Roles in the Call Chain

Hiatti Carrier Services manages both inbound and outbound traffic for Hiatti Telecommunications LLC and its customers, ensuring compliance with robocall mitigation standards for all calls on its network.

Commitments and Certifications

Hiatti Carrier Services makes the following commitments:

- 1. STIR/SHAKEN Framework:** We have fully implemented the STIR/SHAKEN framework on our IP network and are pending approval by NECA to finalize access to our own tokens. STIR/SHAKEN is implemented for both domestic and international traffic, and updates to the framework are implemented in a timely manner.
- 2. Traceback Request Compliance:** We commit to responding to any traceback request from the FCC, law enforcement, or the Industry Traceback Group (ITG) within 24 hours, providing all requested information promptly. A designated point of contact is established to ensure immediate action.
- 3. Customer Certification:** All customers of Hiatti Carrier Services are required to undergo a thorough Know Your Customer (KYC) process, ensuring compliance with robocall mitigation requirements.
- 4. Service Termination for Violations:** Hiatti Carrier Services includes strict provisions in our Terms and Conditions that allow for immediate suspension or termination of services if fraudulent or illegal traffic is identified. Customers are given a clear escalation path and are expected to take corrective action within 24 hours if issues arise.
- 5. Call Monitoring and Blocking:** We monitor call patterns through automated systems and manual reviews, focusing on metrics such as Call Completion Ratio (CCR), Answer to Seizure Ratio (ASR), and Average Call Duration (ACD). Traffic that does not meet these standards or shows signs of being illegal is immediately blocked or flagged for review.

Traffic Monitoring and Blocking

- Inbound Traffic:

- **Reputation-Based Routing:** We rely on spam scores from trusted sources like TruCNAM to make informed routing decisions.

- **Global Blocking:** We block numbers on the SOMOS Do-Not-Originate (DNO) list, as well as unallocated or invalid U.S. numbers. Our blocking system is updated in real-time to reflect changes in the DNO list, ensuring accuracy and minimizing errors.

- Outbound Traffic:

- **Traffic Authorization:** All outbound traffic is authorized through SIP Registration or authorized IP addresses.
- **Traffic Blocking:** We block any traffic lacking a proper SS Identity header, appearing on the SOMOS DNO list, or originating from unallocated or invalid numbers.
- **Proactive Monitoring:** Our system flags and blocks suspicious traffic based on the metrics mentioned above. Reviews are conducted daily, with manual escalations for flagged traffic.

Traceback Requests

Hiatti Carrier Services works in close collaboration with the Industry Traceback Group (ITG) and promptly addresses any traceback requests within 24 hours. Our internal process for handling these requests includes:

1. **Immediate Action:** Upon receiving a traceback request, we immediately block the affected ANI(s).
2. **Information Sharing:** We provide requested information to law enforcement and ITG promptly, maintaining full transparency.
3. **Client Communication and Response:** If a customer is involved in illegal traffic, we notify them within 24 hours, requiring immediate corrective action. Repeat violations may result in termination of services.
4. **Pattern Reviews:** Weekly and monthly reviews of traceback requests and flagged traffic patterns are conducted to identify and mitigate ongoing issues. Persistent violations trigger further investigation, and services may be terminated if the customer fails to comply.

Know Your Customer (KYC) Process

Hiatti Carrier Services conducts a thorough KYC process to ensure that all clients comply with regulatory requirements and do not engage in illegal or unwanted traffic. The KYC form, included as ****Attachment A****, gathers key information such as:

1. Corporate Information:
 - Company Name
 - Trade Names (DBA)
 - Holding Company
 - State of Incorporation
 - Federal Tax ID Number
 - Website URL
2. Regulatory Information:
 - FCC 499 Filer ID
 - RMD Registration Number
3. Corporate Ownership:
 - Officer/Owner/Principal information, including name, title, and contact details.
4. Compliance History:
 - Questions regarding previous network blocks, adverse civil judgments under the TCPA, TSR, or other relevant laws, and any regulatory issues related to illegal robocalls.

We require customers to update this information regularly, especially if there are any changes in their business operations or compliance status.

5. Document Requests:
 - Customers must provide supporting documentation outlining their internal compliance processes, procedures for handling traceback requests, and tools used to monitor and review traffic for unlawful robocalls.

Customer Certification

Customers are required to certify the following:

- Acknowledgment and compliance with U.S. laws prohibiting illegal voice traffic, including the Telephone Consumer Protection Act, Truth in Caller ID Act, Telemarketing Sales Rule, and the Wire Fraud Statute.
- A commitment to responding promptly to any inquiries or traceback requests and taking swift action to address illegal traffic on their network.
- Agreement to incorporate contract terms with their upstream sources, ensuring compliance with robocall mitigation requirements and industry traceback initiatives.

By signing the KYC form, customers acknowledge that they are legally bound to these commitments and will take responsibility for ensuring the lawful use of Hiatti Carrier Services.

Version Control and Continuous Updates

This Robocall Mitigation Plan will be reviewed and updated regularly to reflect any changes in regulatory requirements, technological advancements, or customer operations. All updates will be tracked through a version control system to ensure accurate and up-to-date compliance measures.

Conclusion

This comprehensive plan, along with the associated KYC form, ensures that Hiatti Carrier Services remains in full compliance with FCC regulations, including the TRACED Act and STIR/SHAKEN requirements, while proactively combating illegal robocalls. The plan outlines clear measures for traffic monitoring, traceback cooperation, and service termination in the event of non-compliance, demonstrating Hiatti Carrier Services' commitment to protecting the integrity of the communications network.

Hiatti Carrier Services | Attachment A: KYC Form

Hiatti Carrier Services LLC - Customer Form

Corporate Information:

- 1. Company Name: _____
- 2. Please list all DBA, Other Trade Names, Holding Company:

- 3. State of Incorporation: _____
- 4. Federal Tax ID Number: _____
- 5. Company Website: _____

Regulatory Information:

- 1. FCC 499 Filer ID Number: _____
- 2. RMD Registration Number: _____

Corporate Ownership:

Name	Title	Phone/Email

Contact Information:

- 1. Primary Contact: _____
- 2. Business Address: _____
- 3. Billing Address: _____

Billing

- 1. Name: _____
- 2. Email: _____
- 3. Phone: _____

Compliance

- 1. Name: _____
- 2. Email: _____
- 3. Phone: _____

Operations:

- 1. Name: _____
 - 2. Email: _____
 - 3. Phone: _____
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Use Case and Compliance

1. Please describe how you plan to use voice services:

2. Do you engage in telemarketing? (Yes/No) _____

3. Have you been blocked from another provider's network after being determined to be a "bad-actor upstream voice service provider" pursuant to a notice to the FCC? (Yes/No) _____

4. Have you or any controlling individuals of the entity ever faced an adverse judgment in a civil lawsuit involving claims under the Telephone Consumer Protection Act (TCPA), the Telemarketing Sales Rule (TSR), or any other legal action related to robocalls, automated dialing, calls to the National Do Not Call Registry, any state do not call registry, spoofed caller ID numbers, or unlawful telemarketing or solicitation practices? (Yes/No) _____

Document Request

Please provide any documents that will help us understand your internal compliance process, including those detailing your procedures for handling Traceback Requests and monitoring, reviewing, and analyzing call traffic to address unlawful robocalls.

Certification

The undersigned certifies that they are an officer of the Customer and that the Customer is fully aware of U.S. laws prohibiting the generation and transmission of illegal, harassing, or otherwise unwanted voice calls. These laws include, but are not limited to, the Telephone Consumer Protection Act, Truth in Caller ID Act, Telemarketing Sales Rule, and Wire Fraud Statute. The undersigned further affirms that the Customer complies with these laws and agrees to provide full disclosure if any inquiries arise concerning potential violations.

Additionally, the undersigned acknowledges that the Customer is aware of the communications industry's traceback initiatives and commits to responding promptly to all traceback requests. The Customer will take swift and effective measures to address any illegal traffic on its network. Furthermore, the Customer agrees to incorporate contract terms with its clients to ensure that all upstream sources are knowledgeable about and in compliance with laws prohibiting the generation and transmission of illegal, harassing, or otherwise unwanted voice calls.

I verify that I am authorized to legally bind the Customer by my signature.

Name: _____

Title: _____

Signature: _____

Date: _____