

Robocall Mitigation Plan

Business Information

Pay Call Corp
1414NW 8th Street
Dania Beach Florida, 33004

Contact Information

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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 (rel. March 17, 2023) ("R&O") 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;
- "know your upstream provider";
- ownership information;
- 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

Pay Call Corp ("PayCall") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, PayCall has not implemented STIR/SHAKEN yet (as it has not started offering voice services yet) but is in the process of becoming STIR/SHAKEN compliant. In compliance with the R&O, PayCall submits this RMP and certification.

Know Your Customer ("KYC")

New PayCall subscribers will be required to provide the following:

- Full name (first and last name)
- Company name
- Registered business name
- EIN (Employer Identification Number) or Social Security Number
- Company email address
- Complete address, including country, city, and zip code

- Business website
- The intended use of our services.

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, PayCall provides the following information concerning its upstream voice service carrier.

PayCall has one upstream provider from which it will receive voice traffic:

1st point Communications
401 East 34th Street Suite
#N27J
New York, NY 10016
Erik Levitt
elevitt@1pcom.com

PayCall has a master service agreement with its upstream provider that provides that the upstream provider will sign calls transmitted to PayCall and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to PayCall. PayCall and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

PayCall has an AUP that subscribers will need to agree to before being permitted to use PayCall's software and services. Among other things, the AUP prohibits:

- using our service for any illegal purposes whatsoever;
- engaging in activity for which FCC or any equivalent national regulatory authority, has restricted or regulated in relation to proper use of the public telephony network or the Internet;
- using our service if PayCall determines, at its sole discretion, that its provision for this customer is prohibited by applicable law or has become impractical or unfeasible for any legal or regulatory reason;
- using our service to engage in spam calling; and
- using our service to offer or otherwise make available to others fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

Telephone Number Authorization

Caller IDs will be restricted to verified users, ensuring proper assignment of numbers to businesses. We will limit the frequency and amount of payments to mitigate misuse.

New subscribers placing outbound calls will only be allowed to use Caller IDs which have been purchased through our platform or ones verified through automated-number-validation voice call. Subscribers will be able to sign a form allowing them to use Caller IDs not purchased through our

platform or verified by validation call for outbound calls. This functionality will be restricted to customers with whom we have had human contact by phone call or in person. This form:

- will prohibit the sending of outbound traffic via the PSTN with Caller IDs not owned by the customer or the customer's subscribers; and
- will state that, if PayCall receives notice that the Customer's outbound calls through our platform are deemed to be spam, PayCall has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

We plan to utilize advanced call analytics systems to monitor call traffic for patterns indicative of unlawful activities. Suspicious activities will be flagged immediately, and mitigation steps will be taken to ensure compliance.

PayCall will work to detect calling patterns consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but will not be limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

No third-party vendors will be involved in deploying PayCall's analytics.

Investigate Suspicious Activity

We will receive alerts if suspicious activity is detected. In some cases, targets will be automatically blocked and marked as FRAUD. A global Speedy DDoS mechanism in the SBC system will automatically blacklist clients who make an unusual volume of calls to or from the same destination within a predetermined time frame, such as more than five times in a single minute. Such clients will be automatically blocked from dialing that destination.

PayCall will follow Industry Traceback Group ("ITG")-recommended best industry practices and cooperate in traceback and trace forward investigations. To allow for timely and comprehensive responses, PayCall will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

PayCall will promptly respond to Do Not Originate requests it receives from the ITG. PayCall has mechanisms to automatically block suspicious calls. If PayCall's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, PayCall will take appropriate action which may include suspending or terminating the subscriber's use of PayCall's network. PayCall will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and 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. PayCall will monitor the industry's 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, PayCall 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.

Certification of Michael Magen

I, Michael Magen, CEO of PayCall, do hereby certify, under penalty of perjury, the following:

- (1) PayCall has not implemented STIR/SHAKEN in the IP portions of its network, as it has not started offering voice services yet. PayCall is in the process of becoming STIR/SHAKEN compliant.
- (1) PayCall's Business name and primary address are as follows:

Pay Call Corp.
1414NW 8th Street
Dania Beach Florida, 33004
- (2) PayCall has no other business names in use.
- (3) PayCall has not previously used any other business name.
- (4) 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.
- (5) The following entities own more than 10% of PayCall each: Magen Ventures LLC and Mallen Ventures, LLC.
- (6) The following persons are PayCall's principals: Michael Magen and Adi Rosso.
- (7) PayCall has the following affiliates: Magen Ventures LLC and Mallen Ventures, LLC, Mallen Family Ltd., A&L RO Holdings Ltd., Paycall Technologies Ltd.
- (8) None of the persons/entities in items 5 – 7 above have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) PayCall's role in the call chain will be that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. PayCall has not started offering voice services yet and is in the process of becoming STIR/SHAKEN compliant.
- (10) PayCall has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) PayCall is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) PayCall has not started offering voice services yet and is in the process of obtaining its Operating Company Number.

/s/ Michael Magen
Michael Magen

Date: December 2, 2024.