

Robocall Mitigation Plan

Business Information

Documo, Inc.
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Contact Information

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Overview

In the Commission's 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 includes:

- "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

Documo, Inc. ("Documo") is a focused VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. Documo is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. Because Documo does not have access to the necessary infrastructure, it is not required to be STIR/SHAKEN compliant. Documo works closely with its upstream provider 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 Documo in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Documo's Know Your Customer (KYC) procedures are designed to prevent the onboarding of subscribers who may originate illegal robocalls. These procedures include obtaining the name, address, phone number, points of contact, nature of business, and other pertinent information from each potential subscriber before they are permitted to use 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, Documo provides the following information concerning its upstream voice service carriers:

Inteliquent, Inc.
550 W Adams Street
Suite 900
Chicago, IL 60661
+1 (217) 862-1953

Sinch America, Inc.
3500 Lenox Road NE
Suite 1875
Atlanta, GA 30326
+1 (866) 629-8200

Onvoy, LLC
One North Wacker Drive
Suite 2500
Chicago, IL 60606
+1 (312) 384-8000

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

Telephone Number Analytics

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Documo and/or obtained by Documo from Documo's underlying carrier for use by the subscriber. In most cases, Documo directly manages the TNs used by its subscribers. Documo tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Documo's assignment of the TN to its subscriber.

Analytics for Monitoring Traffic

Documo works with its upstream provider 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).

Inteliquent is the only third-party vendor assisting Documo with deployment of its analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Documo works with its upstream provider to follow defined procedures on investigating such subscribers. These procedures include:

- 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.

Documo follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback investigations. To allow for timely and comprehensive responses, Documo devotes sufficient resources to provide prompt and complete resources to traceback requests.

Documo certifies that it will respond to all traceback requests within 24 hours of receiving same.

Blocking

Documo will implement Do Not Originate requests it receives from the ITG. Documo will block calls from known suspicious or unverified sources tied to fraud targeted regions. Documo uses blacklists and third-party databases to identify and block calls associated with unlawful activity. Subscriber calls are tagged with telecom unique resources to allow fast traffic identification.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Documo 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, Documo 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 Chris Geier

I, Chris Geier, Director of Information Security and Compliance of Documo Inc. ("Documo"), do hereby certify, under penalty of perjury, the following:

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

Documo, Inc.
919 North Market Street
Suite 950
Wilmington, DE 19081
- (3) Documo has no d/b/a and has not previously used a d/b/a.
- (4) The following persons and entity own more than 10% of Documo: Matt Schultz, Radian Capital Partners, and Arthur Ventures.
- (5) Documo has no subsidiaries or affiliates.
- (6) Neither Documo nor any of the persons/entities listed herein have been subject to an FCC enforcement proceeding or have been forbidden to file in the Robocall Mitigation Database.
- (7) 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.
- (8) Documo's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (9) Documo's OCN is 134L

-----*Chris Geier*-----
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