

Robocall Mitigation Plan

360 Broadband is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across their entire network, (2) implemented STIR/SHAKEN on a portion of their network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and promptly to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

360 Broadband purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290), which provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to 360 Broadband.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

Currently all VoIP subscribers are also customers on fixed wireless equipment or FTTH and has had a 360 employee come and install their equipment. We took this approach because we are not able to guarantee the customer's VoIP experience if they are on another Internet provider. Historically we have served a few customers that did not have our Internet service but we had a full account record for these and they were still visited by a 360 employee for the installation of their VoIP equipment. This is the most important aspect of our mitigation approach as if any fraudulent activity is detected, we have full records and knowledge of the end user. We do not blindly sell VoIP services online.

International Subscribers

360 Broadband does not sell origination or termination services to subscribers outside the United States.

Acceptable Use Policy

360 Broadband maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use 360 Broadband's broadband or voice services. Among other things, this AUP prohibits:

(d) "Prohibited VoIP Activities" include without limitation the following:

- (i) Creating a false Caller ID identity (“ID Spoofing”) or false email/SMS address or header, or otherwise attempting to mislead others as to the identity of the sender or the origin of any communication made using the Services.
- (ii) Auto-dialing or “predictive” dialing (i.e., non-manual dialing or using a software program or other means to continuously dial or place out-bound calls including texts).
- (iii) Sending pre-recorded or artificial voice calls (also known as “Robocalls”) for any reason without the prior express consent of the recipient.
- (iv) Trunking or forwarding Customer’s 360 Broadband VoIP number to another phone number(s) capable of handling multiple simultaneous calls, or to a private branch exchange (PBX) or a key system.
- (v) Using or hosting bulk call-in lines (e.g., customer support or sales call centers, “hotlines,” 900 numbers, sports-line numbers, etc.) for Residential and Commercial Services.

Traceback Requests

360 Broadband is committed to responding promptly to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the industry traceback consortium. Furthermore, 360 Broadband is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use 360 Broadband service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to netopslegal@360broadband.com for immediate processing by 360 Broadband.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by 360 Broadband or our wholesale partner Atheral LLC, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to 360 Broadband of authorization to use a TN, documentation will be provided to Atheral LLC so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, Atheral LLC, uses TransNexus’s ClearIP solution to monitor our origination voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. Atheral will immediately ask 360 Broadband to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If 360 Broadband or Atheral LLC determines that the caller was attempting to originate unlawful robocalls, we either warn them to stop or terminate their service based on our AUP.

Examples of calling patterns monitored:

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to a high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Atheral LLC has fully implemented STIR/SHAKEN as of June 30th, 2022.