

Robocall Mitigation Plan

Business Information

Professional Value Internet Services, LLC
801 S Main
Ste. 1,
Stillwater, OK 74074

Contact Information

Nick Beverage
CEO
(405) 624-6000 ext. 110
nbeverage@provalue.net

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 (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, outlines "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" procedures;
- 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 an 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

Professional Value Internet Services, LLC ("Provalue") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. In compliance with the R&O, Provalue submits this RMP and certification.

Know Your Customer ("KYC")

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 Provalue in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Provalue's KYC program involves obtaining specific subscriber information before the prospective customer can commence service. This process includes collecting information such as:

- physical business location;
- contact person(s);
- nature of the customer's business;
- phone number; and
- driver's license number, Social Security number & FEIN.

Acceptable Use Policy ("AUP")

Provalue maintains an AUP that subscribers must agree to before being permitted to use its service. Provalue's AUP may be found here: <https://provalue.net/acceptable-use/>

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, Provalue provides the following information concerning its upstream voice service carrier:

Atheral LLC
1309 Coffeen Ave
Ste 5838
Sheridan, Wyoming 82801
Daniel White
support@atheral.com

Provalue and its upstream providers have agreed to work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Monitoring With Analytics

Provalue works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Provalue detects a calling pattern consistent with illegal robocalls, we will identify the party and will take appropriate action. Taking appropriate action may include, but is not 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 system.

There are no third-party vendors involved in deploying Provalue's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Provalue follows certain procedures on investigating such subscribers. The procedures established include but are not limited to:

- 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 unusual behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

Provalue follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Provalue devotes sufficient resources to provide prompt and complete resources to traceback requests. Provalue will respond to traceback requests within 24 hours of being notified of same.

Blocking

Provalue will implement Do Not Originate requests it receives from the ITG. Provalue works with its upstream carrier to block suspicious calls. If Provalue and/or its upstream carrier identify suspected robocalling patterns that are confirmed with further investigation, Provalue will take appropriate action which may include suspending or terminating the subscriber's use of Provalue's network. Provalue will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), and the FCC, the ITG, as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Provalue 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, Provalue 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 Nick Beverage

I, Nick Beverage, Chief Executive Officer of Professional Value Internet Services, LLC ("Provalue") do hereby certify, under penalty of perjury, the following:

- a. Provalue's business name and primary address are as follows:

Professional Value Internet Services, LLC
801 S Main
Ste. 1,
Stillwater, OK 74074

- b. Provalue's d/b/a name is ProValue.Net.
c. Except as listed above, Provalue has not previously used any other business names.
d. 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.
e. The following person own 10% or more of Provalue: Jerry Shon Beverage, President and Primary Shareholder. Jerry Shon Beverage and Nick Beverage are Provalue's sole principals. Provalue has no affiliates or subsidiaries.
f. Provalue's role in the call chain is that of a voice service provider that is exempt from STIR/SHAKEN implementation due to its lack of control over the necessary infrastructure.
g. Provalue is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
h. Provalue has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
i. Provalue is not required to, nor does it have, an Operator Code Number.

Nick Beverage
Nick Beverage