

Robocall Mitigation Plan

Business Information

ConnectMe, LLC¹
2915 Ogletown Road
Suite 2262
Newark, DE 19713

Contact Information

William Ralph Watson III
Vice President Technology
416-350-7132
trwatson@cloudli.com

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 an 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

ConnectMe, LLC ("ConnectMe") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. As certified in the FCC's Robocall Mitigation Database, ConnectMe has fully implemented STIR/SHAKEN. In compliance with the R&O, ConnectMe submits this RMP and certification.

¹ This robocall plan is filed by Cloudli Communications Inc., the successor-in- interest to ConnectMe. As the administrative process of transferring ConnectMe's STIR/SHAKEN token and certificate to Cloudli is in progress, Cloudli is filing this robocall plan out of an abundance of caution, to ensure that the voice traffic associated with ConnectMe is not blocked. The information contained herein pertains to Cloudli, including its OCN, upstream carriers, and call monitoring analytics.

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

New subscribers go through identity verification protocols which are a mixture of algorithmic check and manual call back. A risk score is developed to ensure the authenticity of a new subscriber. This score checks the identity marker collected during an account registration process. These include but are not limited to: name, email address, credit card information and contact phone number. These identity markers are validated for accuracy against public and paid tools. All new subscriber activity is monitored and limited by a Usage Policy designed for new customers. Existing customers are moved to a less limiting Usage Policy as we develop trust that the account is not compromised and is being used for its intended purpose and have a better understanding of their regular usage needs. Usage Policies are always limiting and users that intend to increase usage beyond their policy limits must submit a request to be assigned a new Usage Policy and provide justification.

Acceptable Use Policy ("AUP")

ConnectMe maintains an AUP that subscribers must sign before being permitted to use ConnectMe's system. ConnectMe's AUP is here: <https://www.Cloudli.com/terms-of-service>

Know Your Upstream Provider

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, ConnectMe provides the following information concerning its upstream voice service carriers:

VoIP Innovations
Eight Penn Center,
Suite 100
West Pittsburgh, 15276
support@voipinnovations.com

Peerless
433 W Van Buren Street,
Suite 410S
Chicago IL, 60607
support@peerlessnetwork.com

Sinch America, Inc.
7000 Central Parkway,
Suite 1480
Atlanta GA, 30328
support@inteliquent.com

ConnectMe's agreements with its upstream providers contain no provision specific to robocall mitigation. ConnectMe has, however, received assurances from those providers that they will, and will continue to, sign calls transmitted to ConnectMe, and will work closely with ConnectMe to mitigate illegal robocall traffic.

Monitor Traffic With Analytics

ConnectMe works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If ConnectMe 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.

No third-party vendors are involved in deploying ConnectMe's analytics

Investigate Suspicious Activity

ConnectMe investigates suspicious activity found by its monitoring systems or reported to ConnectMe by subscribers or third parties. The investigation could potentially result in opening a traceback request or with ConnectMe contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

ConnectMe is familiar with and uses best efforts to follow the Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Clpoudli will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

ConnectMe has already implemented a Do Not Originate request that it received from the ITG. ConnectMe has mechanisms to block suspicious calls using internal analytics. If ConnectMe's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, ConnectMe will take appropriate action which may include suspending or terminating the subscriber's use of ConnectMe's network.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. ConnectMe 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, ConnectMe 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 William Ralph Watson III

I, William Ralph Watson III, Vice President Technology of Cloudli Communications Inc. (aka "Cloudli," the successor-in interest to ConnectMe) do hereby certify the following:

- a. ConnectMe (vis-à-vis Cloudli) has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. ConnectMe's business name and primary address are as follows:

Cloudli Communications Inc.
2915 Ogletown Road
Suite 2262
Newark, DE 19713

- c. ConnectMe's has no other business names in use.
- d. ConnectMe previously used the business name ConnectMe, LLC
- e. 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.
- f. ConnectMe had one owner: CPS Partners Fund LP, which owned 100% of ConnectMe. The business information for Cloudli is found in RMD0002452.
- g. ConnectMe's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- h. ConnectMe and its interest holder have not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. ConnectMe and its interest holder have not subject been to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Cloudli Communications Corp. ("Cloudli") is the successor-in-interest to ConnectMe.
- k. Cloudli's Operator Code Number is 393J.
- l. ConnectMe's Operator Code Number is 719J.



William Ralph Watson III