

EZ Mobile, LLC
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Robocall Mitigation Plan

Overview

EZ Mobile, LLC (EZ Mobile) advises the FCC that it does not terminate voice calls to the USA, but is registering with the Robocall Mitigation Database (RMD) because its telecom providers have indicated that if EZ Mobile did not register with RMD, they would have to stop providing all telecom services, including international termination to EZ Mobile.

FCC Order EB-TCD-24-00036891 released on December 10, 2024 states in paragraph 1, "Removal of a Company's certification from the RMD would require all intermediate providers and voice service providers to cease accepting all calls directly from the Company." EZ Mobile's wholesale telecom provider has informed EZ Mobile that services would be terminated if EZ Mobile was not registered on the RMD. EZ Mobile claims that it is not required to be Stir/Shaken compliant due to the fact that it does not terminate calls to the USA, but is registering with the RMD to safeguard its business.

EZ Mobile has not been prohibited from filing a certification in the Robocall Mitigation Database.

EZ Mobile does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

EZ Mobile has no knowledge of the origination or transit of illegal robocalls as it does not terminate traffic to the USA.

Know Your Customer

EZ Mobile only receives calls from other carriers and knows each and every wholesale carrier that we provide services for, but we do not know the originating caller nor terminating party. Our telecom traffic does not terminate to the USA.

Traceback

We do not terminate calls to the USA so it is impossible for us to have traceback requests from the Commission, law enforcement or the registered traceback consortium. We have never had and do not intend to terminate calls to the USA so it is impossible for illegal robocallers to use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We do not terminate calls to the USA so it is impossible to identify suspected illegal robocalls.

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.

The FCC Orders do not take into consideration any US carriers that only terminate calls to other countries and do not terminate calls to the US.

Investigate Suspicious Activity

EZ Mobile investigates suspicious activity found by its monitoring systems or reported to EZ Mobile by subscribers or third parties. Due to the fact that EZ Mobile does not terminate calls to the USA, the investigation would not result in opening a traceback request or with EZ Mobile 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.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. EZ Mobile 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, EZ Mobile 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.

Contact Information

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