

Robocall Mitigation Plan

Business Information

Tech Aether LLC
8th The Green, Suite-B
Dover, Delaware – 19901

Contact Information

Ujjwal Acharya
CEO
+1-302-261-3783
ujjwal@techaether.com

Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O"), 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 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

Tech Aether LLC ("Tech Aether") is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. Tech Aether is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Tech Aether was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as Tech Aether now file RMPs. This document delineates Tech Aether's RMP. Because Tech Aether does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, Tech Aether works closely with its upstream provider to carry out the required mitigation functions.

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

Tech Aether's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls, and 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, 38 FCC Rcd 5404 (2023), Tech Aether provides the following information concerning its upstream voice service carrier.

Tech Aether has one upstream provider from which it receives voice traffic:

MVNO Connect, LLC
40 Lake Bellevue Drive, Suite 340
Glenn Wisegarver
glenn@mvnoc.com

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

Acceptable Use Policy ("AUP")

Tech Aether maintains an AUP that subscribers must sign before being permitted to use Tech Aether's network. Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Tech Aether's service to engage in or in connection with fraudulent activities.

Tech Aether's contractual terms with subscribers specify that Tech Aether may take action up to suspension or termination of service for violation of the AUP.

Mitigation During Service

Tech Aether works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Tech Aether works with its upstream provider whose upstream provider identifies 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).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Tech Aether works with its upstream provider who works with its respective upstream provider to follow defined 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 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.

Because Tech Aether does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Tech Aether's analytics.

Tech Aether follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Tech Aether will devote sufficient resources to provide prompt and complete resources to traceback requests. Tech Aether commits to responding to traceback requests fully within 24 hours.

Tech Aether works with its upstream provider and its respective upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to Tech Aether by subscribers or third parties. The carrier provides details on the specific account or MSISDN that has been flagged for suspicious activity. The investigation could potentially result in opening a traceback request or with Tech Aether contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated Tech Aether contracts governing the transport of voice calls, Tech Aether will endeavor to contractually require Tech Aether's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

Tech Aether will implement Do Not Originate requests it receives from ITG. Tech Aether's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If Tech Aether and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Tech Aether will take appropriate action which may include suspending or terminating the subscriber's use of Tech Aether Tech Aether's service. Tech Aether will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. Tech Aether will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

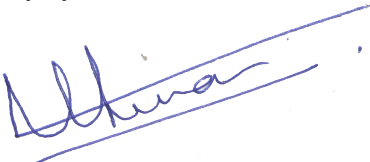
In the event of any material change to this plan, Tech Aether will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Ujjwal Acharya

I, Ujjwal Acharya, CEO of Tech Aether LLC, do hereby certify, under penalty of perjury, the following:

- (1) Tech Aether LLC ("Tech Aether"), 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) Tech Aether 's Business name and primary address are as follows:

Tech Aether LLC
8th The Green, Suite-B
Dover, Delaware – 19901
- (3) Tech Aether uses the business name Aelixar.
- (4) Tech Aether has not previously used any other business name.
- (5) Ujjwal Acharya is the sole owner of more than 10% of Tech Aether and person exercising management and control over Tech Aether. He has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) Tech Aether has no subsidiaries or affiliates.
- (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) Tech Aether's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (9) Tech Aether has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (10) Tech Aether is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) Tech Aether is not required to have, and does not have an operating company number.



Ujjwal Acharya

Date: February, 27th 2025