

Robocall Mitigation Plan

Business Information

Purplefish Software, Inc.
379 West Broadway #208
New York, NY 10012

Contact Information

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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 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

Purplefish Software, Inc. ("Purplefish") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. Because Purplefish lacks control of the infrastructure necessary to implement STIR/SHAKEN, it is not required to be STIR/SHAKEN compliant. In compliance with the R&O, Purplefish 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 Purplefish in which we transmit, originate, and/or terminate calls on behalf of the subscriber.

Purplefish's signs enterprise agreements with large, well-established companies. Accordingly, much of the KYC information is publicly available. Nonetheless, Purplefish has KYC procedures when

onboarding our subscribers that include collecting subscribers' EINs, business addresses, and additional contact information such as telephone numbers and email addresses of pertinent officials.

Acceptable Use Policy ("AUP")

Purplefish maintains an AUP that subscribers must agree to before being permitted to use our network. Our AUP is here:

<https://app.termly.io/policy-viewer/policy.html?policyUUID=d08011d9-21a3-4570-a402-b18c08888997>

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

Telnyx, LLC
600 Congress Ave
14th Floor
Austin TX 78701
Olive Morris
312 270 8153
regulatory@telnyx.com

Purplefish and its upstream provider have agreed to work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests. Purplefish's upstream provider is listed as STIR/SHAKEN compliant in the Robocall Mitigation Database.

Monitoring With Analytics

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

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Purplefish follows procedures to investigate such subscribers. These procedures include but are not limited to, consulting recordings and timestamps of all inbound/outbound calls. Purplefish also has alerting and logging to help identify unusual call behavior, such as volume, call patterns, and duration of the calls.

Purplefish follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Purplefish will devote sufficient resources to provide prompt and complete resources to

traceback requests. Purplefish certifies that it will respond to traceback requests within 24 hours of receiving same.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Purplefish and/or obtained by Purplefish from its underlying carrier for use by the subscriber. In most cases, Purplefish directly manages the TNs used by its subscribers. Purplefish tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Purplefish's assignment of the TN to its subscriber. When originating a call, Purplefish checks the calling party number against Purplefish's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Blocking

Purplefish will implement Do Not Originate requests it receives from the ITG. Purplefish works with its upstream carrier to block suspicious calls. If Purplefish and its upstream carrier identify suspected robocalling patterns that are confirmed with further investigation, Purplefish will take appropriate action which may include suspending or terminating the subscriber's use of Purplefish's network. Purplefish cooperates with Investigative Bodies (*e.g.*, provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), the FCC and 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. Purplefish will monitor industry best practices and continuously improve our internal processes to ensure this plan is in compliance with FCC rules, and our system is adapted to address ever-changing robocall mitigation challenges.

In the event of any material change to this plan, Purplefish 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.

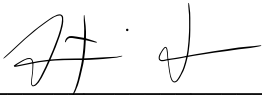
Certification of Martin Kess

I, Martin Kess, CTO of Purplefish Software, Inc. ("Purplefish") do hereby certify, under penalty of perjury, the following:

- a. Purplefish is not required to implement STIR/SHAKEN, due to its lack of control over the necessary infrastructure.
- b. Purplefish's business name and primary address are as follows:

Purplefish Software, Inc.
379 West Broadway #208
New York, NY, 10012

- c. Purplefish has no d/b/a's.
- d. Purplefish has not previously used any other business names.
- 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. The individuals with 10% or more ownership in Purplefish, and Purplefish's sole principals are: Adam Sirois and Martin Kess.
- g. Purplefish role in the call chain is that of a voice service provider with no STIR/SHAKEN implementation obligation.
- h. Purplefish is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Purplefish has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Purplefish is not required to, and does not have, an Operator Code Number.



Martin Kess