

Robocall Mitigation Plan

Business Information

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Contact Information

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Overview

In the Commission's recent 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, 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;
- 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

Albuquerque Telephone & Technology, LLC is a small provider of Digital Voice & Video Service with an agreement with XcastLabs who is now Clearly IP. In this agreement, XCast is the developer and owner of computer programs ("Software") and associated systems software and applications ("Applications") used for Digital Voice and Video ("DV&V") - also known as Voice over Internet Protocol ("VoIP") - telecommunications, call routing, customer care, IP-PBX provisioning and management, billing and database management. Albuquerque Telephone & Technology, LLC agreement with XcastLabs who is now Clearly IP, provides the Right to Use Software which provides Telecom Services and Features provided by the software. Albuquerque Telephone & Technology, LLC is dedicated to stopping illegal calls from traversing the network and will provide accurate customer information and forward any known irregular call issues to XcastLabs which is now Clearly IP. Clearly IP states that they have fully implemented STIR/SHAKEN.

Know your Customer ("KNC")

Albuquerque Telephone & Technology, LLC is a small company with a small number of customers. We personally know all our customers and attempt to reasonably understand their telecom usage.

When a Customer agrees to sign up for service, we personally meet them and we gather the following information related to the Customer:

- Business Name
- Business Address
- Contact Name
- Contact Email Address
- Contact Phone Number
- Valid Credit Card that matches the name of the business contact
- Customer is provided with the Acceptable Use Policy located in our Terms & Conditions on our website of www.3voip.net.

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, Albuquerque Telephone & Technology, LLC provides the following information concerning its upstream voice service carrier.

Albuquerque Telephone & Technology, LLC does not own, develop or control software used, and we rely on Clearly IP to be compliant with FCC policies and regulations. Clearly IP and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. All the voice traffic that originates from our customers goes thru the Clearly IP Network and all requests made will be provided to Clearly IP.

Eric Pinon