

Robocall Mitigation Plan

Business Information

Carrier Voice Solutions LLC
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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 (adopted March 16, 2023) 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 includes:

- "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

Carrier Voice Solutions LLC ("CVS") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. This document delineates CVS's RMP. CVS is fully STIR/SHAKEN compliant. All calls originated on its network are signed in compliance with 47 CFR § 64.6301(a)(1) and (2). CVS maintains its own SPC token and certificate, and all attestation-level decisions are made directly by CVS in accordance with FCC requirements.

CVS originates and signs calls for its customers, including Bring Your Own Trunk (BYOT) arrangements where applicable.

Know Your Customer

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 CVS in which we transmit, originate, and/or terminate calls based on behalf of the subscriber. Additionally, CVS collects specific information before onboarding a subscriber, including:

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

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

Acceptable Use Policy

CVS maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use CVS's network. Among other things, this 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 CVS's service to engage in or in connection with fraudulent activities.

Telephone Number Analytics

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 CVS and/or obtained by CVS from one of CVS's underlying carriers for use by the subscriber. In most cases, CVS directly manages the TNs used by its subscribers. CVS tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of CVS's assignment of the TN to its subscriber.

Traceback Responses

CVS confirms that it will respond to traceback requests within 24 hours of receiving the same.

Analytics for Monitoring Traffic

CVS works with its upstream providers to identify 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 are not representative for residential service usage).

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

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, CVS works with its 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.

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

Blocking

CVS will implement Do Not Originate requests it receives from the ITG. CVS has mechanisms to automatically block suspicious calls using internal analytics. If CVS's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, CVS will take appropriate action which may include suspending or terminating the subscriber's use of CVS's network. CVS 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 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. CVS will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

Carrier Voice Solutions LLC regularly reviews the accuracy of its Robocall Mitigation Database filing to ensure that all information remains current and complete. CVS updates its RMD filing, including but not limited to contact information, upstream provider information, and robocall mitigation practices, within ten (10) business days of any material change.

In the event of any material change to this plan, CVS 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 David Tavdi

I, David Tavdi, General Manager of Carrier Voice Solutions LLC ("CVS"), do hereby certify, under penalty of perjury, the following:

(1) CVS's Business name and primary address are as follows:

Carrier Voice Solutions LLC
10845 Griffith Peak Dr.
Las Vegas, NV 89135

(2) CVS has no d/b/a names.

(3) CVS has not previously used any d/b/a names.

(4) CVS has identified and designated its ownership and management as follows: Bijan Hakimi - Majority Owner and David Tavdi - General Manager.

(5) CVS has no parent companies, affiliates, or subsidiaries.

(6) Neither CVS nor any of the persons named herein have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.

(7) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in this robocall mitigation plan.

(8) CVS's role in the call chain is that of a voice service provider with a STIR/SHAKEN obligation.

(9) CVS has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

(10) CVS is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

(11) CVS's operator company number is 291L.

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