

Robocall Mitigation Plan

Business Information

YayYay USA, Inc.
1430 Spring Hill Road
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McLean, VA 22102

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, 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" 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

YayYay USA, Inc. ("YayYay") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. YayYay is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, YayYay has been exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as YayYay file RMPs. This document delineates YayYay's RMP. Because YayYay does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, YayYay 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 YayYay in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Before YayYay allows customers to use our service, we ensure we are taking reasonable steps to understand the customers who intend to use it, in order to reduce the risk of any abuse, or misuse. These due-diligence checks should be considered every time a customer creates an account with us, including existing customers looking to place new orders.

YayYay's KYC program involves obtaining specific information when a subscriber signs up for service. This process includes collecting such information such as:

- name;
- existing telephone numbers and business websites;
- registered company details, trading names and registered office address;
- contact details of the senior manager with responsibility for numbering;
- information about the business customer's network and the services provided; and
- nature of the customer's business;

Acceptable Use Policy ("AUP")

YayYay maintains an AUP that subscribers must agree to when being permitted to use YayYay's network. Text of YayYay's AUP is here: <https://www.yay.com/about/fair-usage-policy/>

Know Your Upstream Provider

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, YayYay provides the following information concerning its upstream voice carrier:

Simwood Inc.
4935 Main St.
STE 7-306
Spring Hill TN 37174
Peter Farmer
Compliance Officer
(833) 857-3277
peter.farmer@simwood.com

Analytics for Monitoring Traffic

YayYay works with its upstream provider 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 is not representative for residential service usage).

Simwood, Inc is the only third party vendor involved in deploying YayYay's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, YayYay 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.

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

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

YayYay works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to YayYay by subscribers or third parties. The investigation could potentially result in opening a traceback request or with YayYay 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 YayYay contracts governing the transport of voice calls, YayYay will endeavor to contractually require YayYay's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

YayYay will implement Do Not Originate requests it receives from the ITG. YayYay's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If YayYay and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, YayYay will take appropriate action which may include suspending or terminating the subscriber's use of YayYay's service. YayYay will cooperate with investigative bodies, including law enforcement, 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 response to the dynamic nature of mitigating illegal robocalling. YayYay 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, YayYay 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 Jez Pickering

I, Jez Pickering, Compliance Officer of YayYay USA, Inc. ("YayYay"), do hereby certify, under penalty of perjury, the following:

1. YayYay, 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. YayYay's Business name and primary address are as follows:

YayYay USA, Inc.
1430 Spring Hill Road
Suite 310
McLean, VA 22102

3. YayYay's trade names are Yay.com and CallSwitch One.
4. Except for Yay.com, YayYay has not previously used any other business name.
5. 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.
6. YayYay's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
7. YayYay has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
8. The persons with 10% or more ownership of YayYay are YayYay Limited. The officers of YayYay are Howard Stevens, David McKay and Jonathan Kay.
9. YayYay is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
10. YayYay's operating company number is 780L.


Jez Pickering