

Robocall Mitigation Plan

Business Information

Cowboy Concepts LLC
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Contact Information

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Overview

In the Federal Communications Commission ("FCC") 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 an 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

Cowboy Concepts LLC ("Cowboy") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates Cowboy's RMP. As certified in the FCC's Robocall Mitigation Database, Cowboy has fully implemented STIR/SHAKEN. In compliance with the R&O, Cowboy submits this RMP and certification.

Know Your Customer ("KYC")

New Subscribers

Cowboy requires a government issued photo identification and a "liveness" test to confirm that the person in possession of the ID is the one and the same. Cowboy runs these IDs against DMV records, Anti-Money Laundering, Dark Web, and other checks.

Existing Subscribers

Cowboy requires updates of subscribers' information on all their orders. Each order's identity markers are verified again to ensure the account is not compromised and is being used for its intended purpose.

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), at ¶¶ 49-51, Cowboy provides the following information concerning its upstream voice service carrier.

Cowboy 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 Cowboy and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Cowboy. Cowboy 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")

Cowboy maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Cowboy'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 Cowboy's service to engage in or in connection with fraudulent activities.

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

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

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Cowboy, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Cowboy will attest calls originated with these TNs.

When originating a call, Cowboy checks the calling party number against Cowboy's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Analytics for Monitoring Traffic

Cowboy works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party who is using our network to originate those calls 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 network.

Cowboy uses a third-party vendor for traffic analytics – YouMail, Inc.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted which follows the 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;
- increased scrutiny for customers who are involved in campaigns containing "red flag" terms (including but not limited to: Social Security, Medicare, Auto Warranty Final Courtesy, Amazon, DirecTV, gift cards, disconnection threats, emergency payment, and/or credit card interest rate reduction);
- re-verifying the information requested in our KYC procedures when a client initiates a new campaign, or if there is suspicious activity (including but not limited to a significant change in the number of calls routed through our platform, a change in the client's call pattern, and/or an industry change); and
- Our compliance team is trained on common TSR and TCPA issues and will alert/train the customer if a suspected violation is found.

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

Cowboy will respond to all traceback requests from the FCC, the Federal Trade Commission ("FTC"), and other law enforcement agencies as well as the Industry Traceback Group ("ITG") within twenty-four (24) hours of receiving notice of the request (or such other time frame specified by the requesting entity, if greater than twenty-four (24) hours), if possible. If it is not possible to respond within the designated time frame, Cowboy will communicate its timeline for response to the requesting entity.

The Compliance Officer or their designee will track Traceback Requests to identify clients subject to the High-Risk Client Audits.

Cowboy will investigate suspicious activity found by its monitoring systems or reported to Cowboy by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Cowboy contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform. Cowboy may also notify law enforcement authorities.

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

Blocking

Cowboy will implement Do Not Originate requests it receives from the ITG. If Cowboy's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Cowboy will take appropriate action which may include suspending or terminating the subscriber's use of Cowboy's network. Cowboy 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), to 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. Cowboy 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, Cowboy 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 Ryan Gentry

I, Ryan Gentry, the CEO of Cowboy Concepts LLC ("Cowboy"), do hereby certify, under penalty of perjury, the following:

- (a) Cowboy has fully implemented STIR/SHAKEN in the IP portions of its network.
- (b) Cowboy's Business name and primary address are as follows:

Cowboy Concepts LLC
30 N. Gould Street
Suite 2890
Sheridan, WY 82801.
- (c) Cowboy's sole dba is Drop Cowboy.
- (d) Cowboy previously the had following business names: Binary Ventures, Inc. and Call Cowboy.
- (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 following persons/entities own more than 10% of Cowboy: Peter Reich, Ryan Gentry.
- (g) The following persons exercise management and control over Cowboy: Peter Reich, Ryan Gentry.
- (h) Cowboy has no subsidiaries or affiliates.
- (i) None of the persons/entities listed herein have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (j) Cowboy's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (k) Cowboy has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (l) Cowboy is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (m) Cowboy's Operating Company Number is 773J.

Signed by:

Ryan Gentry