

Robocall Mitigation Plan

Business Information

AUM Technologies LLC
7209 Creedmoor Road, Ste 103
Raleigh, NC 27613

Contact Information

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Overview

In the Commission's recent 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 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

AUM Technologies LLC dba NK Voice ("NK Voice") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

Our company takes several steps to avoid originating illegal robocalls. Given that our customers are primarily pharmacies and doctors' offices, we prioritize ensuring that all calls are legitimate and not disrupted by illegal robocalls. Additionally, we monitor the Call Detail Records ("CDR") for any suspicious activity. We educate our customers about robocalls and encourage them to report any unusual activity to help maintain compliance with FCC regulations.

As certified in the FCC's Robocall Mitigation Database, NK Voice has fully implemented STIR/SHAKEN. In compliance with the R&O, NK Voice submits this RMP and certification.

Know Your Customer ("KYC")

We provide services to health care providers (pharmacy, doctors' offices) and retail businesses like restaurants and UPS Stores. We manage the Caller ID on our PBX platform to make sure we provide correct caller ID for customers.

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 NK Voice in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

NK Voice's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- federal tax ID;
- physical business location;
- contact person(s);
- nature of the customer's business.

NK Voice is a small company, and we have a small number of customers. As a result, we know our customers and understand their use cases.

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, NK Voice provides the following information concerning its upstream voice service carrier.

NK Voice has five (5) upstream providers from which it receives voice traffic:

1. Bandwidth Inc
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
Email: voicesecurity@bandwidth.com
2. Inteliquent, Inc. DBA Onvoy, Sinch
550 W. Adams St.
Suite 900
Chicago IL 60661
Stacy Graham
Director, Assurance & Trust Services
Email: stacy.graham@sinch.com
Tel.: (217) 862-1953

3. Intelepeer Networks LLC
18 Shrewsbury Drive
Rumson NJ 07760
Frank Lauria
Tel.: (732) 713-3562
Email: frank.lauria@esplicity.com
4. HFA Services LLC d/b/a Skyetel
2901 Clint Moor Road
Suite 2, #215
Boca Raton FL 33496
Joey Buchbinder
Tel.: (561) 282-5500
Email: jbuchbinder@skyetel.com

NK Voice has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to NK Voice and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to NK Voice. NK Voice 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 ("AUP")

NK Voice maintains an AUP that subscribers must sign before being permitted to use AUM's network. Among other things, the AUP prohibits:

- using the system for originating robocalls, illegal telemarketing, or spam;
- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- sending unsolicited bulk communications (email, voice, or otherwise);
- violating any applicable law (including any activity that violates local, state, federal, or international law, such as fraud, phishing, or any form of unauthorized access); and
- interfering with the operation of the network, including but not limited to excessive call traffic or service disruptions.

Under AUM's AUP, subscribers must comply with all applicable laws, regulations, and policies regarding the use of AUM's network and services. Moreover, subscribers are responsible for ensuring that their use of the services does not disrupt or harm the network, including preventing fraudulent activities or illegal calls. Subscribers are encouraged to report any suspicious activity or violations of this policy.

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

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones verified through automated-number-validation voice call. Subscribers can sign a form allowing them to use Caller IDs not purchased through our platform or verified by validation call

for outbound calls, functionality that is restricted to customers with whom we've had human contact by phone call or in-person. This form:

- prohibits the sending of outbound traffic via the PSTN with Caller IDs not owned by the customer or the customer's subscribers; and
- states that, if NK Voice receives notice that the Customer's outbound calls through our platform are deemed to be spam, NK Voice has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

Our company monitors Call Detail Records (CDR) for unusual patterns such as high call volumes, short durations, or repeated calls to the same numbers. When suspicious activity is detected, we contact the associated customer to verify legitimacy. If the activity is confirmed as illegal, we block the traffic and cooperate with law enforcement, industry traceback initiatives, and regulatory bodies to address the issue.

No third-party vendors are involved in deploying NK Voice's analytics.

Investigate Suspicious Activity

Our company has several procedures in place to investigate suspicious activity, including potentially illegal robocalls:

1. **Monitoring CDR:** We actively monitor CDRs for unusual patterns, such as a high volume of calls with short durations, repeated calls to the same numbers, or calls originating from unverified sources.
2. **Traffic Analysis:** Suspicious traffic is flagged for further investigation based on predefined thresholds, such as call volume spikes or anomalous call behavior.
3. **Customer Inquiry:** When suspicious activity is detected, we immediately contact the customer associated with the account to verify their intent and confirm the legitimacy of the traffic.
4. **Blocking and Mitigation:** If traffic is deemed suspicious or illegal, we take action to block or throttle the traffic to prevent further potential abuse.
5. **Escalation and Reporting:** In cases of verified illegal robocalls, we cooperate with law enforcement, industry traceback initiatives, and regulatory bodies to trace the source and mitigate further incidents.
6. **Internal Review:** We document all investigations and review them periodically to improve our detection and prevention measures.

NK Voice follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, NK Voice will devote sufficient resources to provide prompt and complete resources to traceback requests. NK Voice commits to responding to traceback requests fully within 24 hours.

Blocking

Our company promptly responds to Do Not Originate ("DNO") requests from the Industry Traceback Group ("ITG"). We validate the request, block unauthorized use of the specified numbers, and notify

affected customers if applicable. Actions are documented, and we cooperate fully with the ITG and regulatory authorities to prevent further abuse.

NK Voice will implement Do Not Originate requests it receives from ITG. NK Voice's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If NK Voice and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, NK Voice will take appropriate action which may include suspending or terminating the subscriber's use of NK Voice's service. NK Voice 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 ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. NK Voice will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, NK Voice 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 Nikunj Patel

I, Nikunj Patel, Customer Success Lead & Co-Founder of AUM Technologies LLC, dba NK Voice ("NK Voice"), do hereby certify, under penalty of perjury, the following:

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

AUM Technologies LLC, dba NK Voice
7209 Creedmoor Road, Ste 103
Raleigh, NC 27613
- (2) NK Voice uses the following business names: NK Voice.
- (3) NK Voice has not previously used any other business name.
- (4) 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.
- (5) The following persons/entities own more than 10% of NK Voice each: Nikunj Patel, Karn Patel.
- (6) The following persons exercise management and control over NK Voice: Nikunj Patel, Karn Patel.
- (7) NK Voice has no subsidiaries/affiliates.
- (8) None of the persons/entities in items 5 – 7 above have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) NK Voice's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (10) NK Voice has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) NK Voice is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) NK Voice's Operating Company Number is 884L.

/Nikunj Patel/
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