



Robocall Mitigation Plan

Port Networks is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across their entire network, (2) implemented STIR/SHAKEN on a portion of their network and that the remained of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and promptly to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- Pledges cooperation with entities investigating and stopping any illegal robocallers that use its services to originate calls

Port Networks purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290), which provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to Port Networks.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

International Subscribers

Port Networks does not sell origination or termination services to subscribers outside the United States.

Acceptable Use Policy

Port Networks maintains an Acceptable Use Policy (“AUP”) that subscribers must sign before being permitted to use Port Networks ‘s broadband or voice services. Among other things, this AUP prohibits using the service in connection with fraudulent activities and violating local/state/federal law.

Port Networks , INC .

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Traceback Requests

Port Networks is committed to responding promptly to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the industry traceback consortium. Furthermore, Port Networks is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Port Networks service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to support@portnetworks.com for immediate processing by our crew.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by Port Networks or our wholesale partner Atheral LLC, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to Port Networks of authorization to use a TN, documentation will be provided to Atheral LLC so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, Atheral LLC, uses TransNexus's ClearIP solution to monitor our origination voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. Atheral will immediately ask Port Networks to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Port Networks or Atheral LLC determines that the caller was attempting to originate unlawful robocalls, we either warn them to stop or terminate their service based on our AUP.

Examples of calling patterns monitored:

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to a high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)

- Robocalling triggers monitoring for a high volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Atheral LLC has fully implemented STIR/SHAKEN as of June 30th, 2022.