

US MOBILE, INC. ROBOCALL MITIGATION PLAN

BUSINESS INFORMATION

US MOBILE, INC
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New York, NY 10017

CONTACT INFORMATION

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OVERVIEW

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”), states 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

USM is a reseller VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. Because USM is a reseller, it lacks control of the infrastructure necessary to implement STIR/SHAKEN, and it is not required to be STIR/SHAKEN compliant. However, the R&O does require resellers to submit RMPs. Because USM does not maintain the infrastructure, it works closely with and relies on its upstream providers to assist in robocall mitigation.

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. USM transmits, originates, and/or terminates calls on behalf of its subscribers.

USM vets its subscribers by collecting their names, email addresses, and addresses. USM also has velocity restrictions based on subscribers' activity and behaviors. USM utilizes a third-party service in its e-commerce traffic to help prevent bad actors from accessing the network and using it for illegal purposes. USM's internal policies include policies concerning subscribers' dollar amount, payment frequency, velocity controls, geo-location, and blacklists. This system translates into a Fraud Risk score that USM uses to apply rules that will reject a new customer, existing customer, or payment, if certain criteria are met.

USM monitors subscriber traffic patterns for anomalies, fraud, or other activity that could result in or be indicative of unlawful robocalling or spoofing. If suspicious patterns are detected, USM may immediately restrict, suspend, or "hotline" the subscriber's line pending investigation.

ACCEPTABLE USE POLICY

USM maintains an AUP that subscribers must accept before being permitted to use USM's network. See www.usmobile.com/legal.

USM'S 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, USM provides the following information concerning its upstream voice service carriers. USM utilizes three upstream providers:

AT&T
208 S. Akard St
Dallas, TX 75202
g03115@att.com

T-Mobile USA, Inc.
12920 S.E. 38th Street Bellevue
WA 98006
robocallmitigationsupport@t-mobile.com

Verizon
1201 Arapaho Rd
Richardson, TX 75081
lulia.barakat@verizon.com

AT&T, T-Mobile and Verizon are also listed as STIR/SHAKEN compliant in the FCC's Robocall Mitigation Database. The parties work together to mitigate all illegal robocalls, including cooperating fully on traceback requests.

ANALYTICS FOR MONITORING TRAFFIC

USM works with its upstream carriers to analyze high-volume voice traffic to identify and monitor patterns consistent with robocalls. The upstream carrier's system alerts it to calling patterns with unusual spikes, traffic patterns, and related matters. Examples of calling patterns monitored include:

- Anomalies in calls generated from a single subscriber
- Number of unique destinations in a set timeframe
- Anomalies in call duration distribution
- Velocity on initiate calls
- Multiple overlapping calls on the same account or line
- Device change frequency/IMEI mismatch patterns

INVESTIGATE SUSPICIOUS ACTIVITY

We monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Combining behavioral analytics, caller authentication and verification, our solution features:

- Fraud Detection: Detection of high volume robocalling, spoofing and spam call activity
- Call Blocking Support: Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- Do Not Call Registry: We comply with the FTC's rules for the Do Not Call Registry as it pertains to voice and text messaging.

When new fraud is detected by USM's Fraud Management team or when other carriers send notifications of fraudulent usage, USM takes prompt action to investigate the suspicious activity and, as appropriate, block or otherwise ensure that the bad actor(s) is identified. If the FCC's robocall rules are violated, and/or other applicable laws and regulations are breached, USM will

take the appropriate measures to rectify the situation, including cancellation of the bad actors' service.

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.

BLOCKING

USM works with its upstream carrier to implement Do Not Originate requests it receives from the Industry Traceback Group ("ITG"). USM will cooperate with Investigative Bodies (provide a single point of contact) to address traceback requests from law enforcement and regulatory entities such as state attorneys general, the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

PLAN UPDATES

FCC requirements, industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. USM will monitor industry best practices and continuously improve 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, USM will file an update to the FCC Robocall Mitigation Database within ten (10) days.

Certification of Michael Melmed

I, Michael Melmed, Chief Financial Officer of US Mobile, Inc. ("USM") do hereby certify, under penalty of perjury, the following:

1. USM is not required to implement STIR/SHAKEN, due to its lack of control over the necessary infrastructure.
2. USM's business name and primary address are as follows: 295 Madison Ave, 6th Floor, New York, NY 10017.
3. USM has no other business name.
4. USM has not previously used any other business name.
5. The following persons own more than 10% of USM: Ahmed Khattak and Volition Capital
6. The following persons are USM's Directors: Ahmed Khattak, Larry Cheung
7. USM has one subsidiary, US Mobile Canada, Toronto, ON.
8. USM's role in the call chain is that of a reseller/voice service provider with no STIR/SHAKEN implementation obligation.
9. USM is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
10. USM has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
11. USM is not required to and does not have an Operator Code Number.

/s/Michael Melmed
Michael Melmed
Chief Financial Officer
US Mobile, Inc.