

Robocall Mitigation Plan

Zentro Internet, LLC (“Zentro”) is headquartered in Chicago, IL and offers internet and VoIP services to both residential and business customers in multiple tenant environments located in the United States since 2010. Zentro does not control the network infrastructure necessary to implement STIR/SHAKEN. Zentro’s origination provider, IGEM Communications LLC (“IGEM”), fully implements STIR/SHAKEN and attests ALL voice calls made from the Zentro network. Zentro has, however, adopted this robocall plan to establish procedures to limit the potential for originating, carrying, or processing unlawful robocalls through its voice services.

Zentro certifies it has not been prohibited from filing in the Robocall Mitigation Database and Zentro has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), Zentro has designated a point of contact to receive notice of illegal robocall traffic or other robocall mitigation-related issues. That person’s name, title, address, phone number and email are available in the Robocall Mitigation Database.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. Know Your Customer

Zentro in partnership with IGEM, follows the North American Numbering Council (“NANC”) Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller’s identity [Best Practices for the Implementation of Call Authentication Frameworks](#). Zentro confirms the identity of all of its customers including, but not limited to (i) contact person(s); (ii) business location, (iii) state or country of incorporation, (iv) federal tax identification; and (v) nature of our customer’s businesses throughout the customer’s service period.

II. Contractual Terms

Customers using Zentro’s services agree to abide by the rules and regulations set forth in our General Terms of Service and Use Agreement found here [Zentro Internet Terms of Service | Legal Agreement & Use Policy](#).

III. Traceback Requests

Zentro commits to respond fully to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium within 24 hours. In the unlikely event illegal robocallers use Zentro’s system to originate calls, Zentro will cooperate with such entities’ investigation.

IV. Robocall Mitigation

Zentro’s underlying voice provider, IGEM, has committed to fully complying with Commission’s robocall blocking requirements and has confirmed that it will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITF. IGEM also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

V. Know Your Upstream Provider

Zentro has an agreement in place with IGEM to resell IGEM's VoIP offering to Zentro's customers. Zentro has confirmed that IGEM is listed in the Robocall Mitigation Database and IGEM has "Know Your Upstream Provider" provisions in place.

VI. Network Monitoring (Call Analytics Systems)

Zentro's end-user services are subject to network monitoring that monitors against illegal robocalls such as high call volumes and high call duration. Designated employees review all flagged call patterns and actively resolve issues as quickly as possible. If the end-user is uncooperative for whatever reason, Zentro will implement mitigation activities, including, but not limited to, suspension or termination of service.

IGEM also has implemented a proprietary fraud detection and mitigation process that analyzes high-volume network traffic to evaluate compliance. IGEM utilizes a variety of fraud detection indicators and fraud prevention best practices. Calls from the Zentro network are routed through to IGEM to verify and certify calls. IGEM also takes remedial action to prevent or remediate robocalling or other fraudulent activity it detects on its customers' systems.

If Zentro's upstream provider determines the call did not originate from Zentro, the call will not be certified and will fail.

VII. Plan Updates

Zentro will continue to monitor industry best practices and review internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.