



Robocall Mitigation Plan for Convo Communications, LLC

Convo Communications, LLC (“Convo”) submits its Robocall Mitigation Plan to the Federal Communications Commission (“FCC” or “Commission”).

Convo is a video relay service (“VRS”) provider that allows persons with hearing or speech disabilities who use American Sign Language (“ASL”) to use video equipment to communicate with voice telephone users. A video link allows a communication assistant (“CA”) and the ASL user to view and sign with each other, and the CA is also connected to a user on the voice side of the call through telephone. The CA interprets and relays the conversation back and forth between the two parties. From a call routing perspective, Convo “relays” its users’ VRS call by inserting a Convo VI into the call via a Convo-controlled, internet-based video link between the CA and Convo’s user. Convo then contracts with an enterprise voice services provider (“Voice Provider”) to route to, and terminate on, the public switched telephone network (“PSTN”) the voice component of the call, which is between the VI and the hearing call recipient.

Convo is the FCC’s only fully certified VRS provider. The FCC rules apply to interpreters, customer support personnel, operations personnel, and all other Convo employees, agents and contractors. Convo VRS personnel, agents and contractors comply with the FCC’s Telecommunications Relay Services (“TRS”) rules in the provision of VRS.

Moreover, the VRS routing architecture effectively safeguards against any material risk that VRS will be used to make unlawful high-volume robocalls. During a VRS call between an authenticated Convo user and a hearing counterparty, a parallel video link allows a Convo CA to view and sign with a Convo customer. A CA relays the hearing party’s speech to the Convo user using ASL and voices the Convo user’s ASL communications to the hearing call recipient. The involvement of a CA in every VRS call prevents VRS from being used for impermissible robocalls.

Extensive Commission regulation of VRS providers, comprehensive verification of the identity of VRS users, participation by CAs on VRS calls, and tight regulation of U.S.-inbound VRS calls from international locations all prevent VRS from being used for robocalling, spoofing, and making high-volume unwanted and fraudulent calls.

STIR/SHAKEN Implementation Status

With respect to STIR/SHAKEN implementation status, Convo is not a telecommunications carrier or provider of private telecommunications, and thus is not required to have a FCC Form 499A on file with the FCC. Additionally, Convo does not fit the categories of entities eligible for an OCN, which are intended to apply to telecommunications providers. Among other things,



applicants for OCNs must submit documentation to support their application, such as interconnection agreements, user invoices, and FCC Form 499As. But Convo does not have interconnection agreements because the voice components of its calls are routed to the PSTN by its Voice Provider, Convo does not have a billing relationship with its users. Convo is unable to obtain a Service Provider Code (SPC) token under the Governance Authority's revised SPC Token Access Policy. As a consequence, Convo is exempt from implementing STIR/SHAKEN. Convo has implemented the robocall mitigation plan described below.

"Know-Your-Upstream Provider" Procedures

As a VRS provider, the voice leg of any VRS call is carried by underlying providers, Bandwidth and Lumen.

Convo exercises due diligence in contracting with underlying providers. Prior to contracting, it researches the nature of the provider's business and collects from each a Form W-9, that includes the provider's business name, type of entity, address, and taxpayer identification number. It also obtains a business contract for each provider so that it can immediately address any issues with the provider.

Know Your Customer Practices & Screening

FCC TRS rules (Section 64.611) require Convo, as a VRS provider, to review and submit the following registration information to the Telecommunications Relay Service-User Registration Database ("TRS-URD") for each user: (1) full name; (2) full residential address; (3) ten-digit telephone number assigned in the TRS numbering directory; (4) last four digits of the user's Social Security Number (or Tribal Identification Number); and (5) date of birth. In addition, Convo collects from each user a signed certification attesting that the user has a hearing or speech disability and understands that the cost of VRS is paid for by contributions from other telecommunications users to the TRS Fund. FCC TRS rules will require Convo to validate the eligibility of each call by querying the TRS-URD prior to the placement of a call, once the TRS Administrator notifies providers that it is ready for mandatory implementation of per-call validation.

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls



Acceptable Use Policies

A customer's use of Convo's service is subject to our terms of service, including the User Agreement and Privacy Policy. Convo prohibits customers from engaging or participating in communications of an abusive, harassing, fraudulent, or unlawful nature while using Convo's equipment, systems, or services. Convo reserves the right to terminate a user's service for violation of these prohibitions.

Monitoring Activities/Procedures for Identifying and Investigating Suspicious Activities

Consistent with Convo's obligations vis-à-vis preventing waste, fraud, and abuse of the Interstate TRS Fund, Convo monitors calling patterns to identify potentially suspicious activities. Convo's monitoring practices detect unusual calling patterns, e.g., calls of limited duration and in excess of a prescribed number. Convo set these parameters based on its analysis of user account settings, call activity, and telephone number verification. If calling activity triggers concern, Convo may disable a user's ability to make calls until an investigation is resolved. Convo does not use any third party analytics.

Commitment of Cooperation to Respond to Traceback Requests and to Stop Illegal Robocallers & Commitment to Update Commission

Convo commits to taking all reasonable steps to avoid originating any illegal robocall traffic; responding within twenty-four (24) hours to all traceback requests received from the Commission, law enforcement, or the industry traceback consortium; and will cooperate with such entities in investigating and stopping any illegal robocallers that use their respective services to originate such calls.

This Robocall Mitigation Plan describes the specific measures that Convo has implemented as of the date of this submission. Convo continually evaluates the efficacy of their measures to combat bad actors and take appropriate steps to improve these measures when needed. Convo will update its Mitigation Plan accordingly in the event of revisions to the plan.