

Robocall Mitigation Plan
Google Fiber North America Inc.

Other DBA Names:

Google Fiber, GFiber, GFiber Phone, and Fiber Phone

Google Fiber North America Inc. submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii). Google Fiber Inc. is the immediate parent of Google Fiber North America Inc. Google Fiber Inc. and Google Fiber North America Inc. are collectively referred to as “GFiber”.

Google LLC is the immediate parent entity of Google Fiber Inc. Google Voice Inc. is an affiliate of Google Fiber North America Inc. (Google LLC and Google Voice Inc. are collectively referred to herein as “Google”).

Alianza, LLC (“Alianza”) is a cloud communications platform that provides wholesale residential and business communication services to GFiber.

Both Google and Alianza provide the underlying platforms and infrastructure for GFiber Phone services. GFiber relies on both Google and Alianza to sign calls since Google and Alianza control its network infrastructure.

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

GFiber has contractual terms with its users that are intended to both prevent new and existing users from originating unlawful calls on its network and also protect users from receiving them.

For example, the GFiber Terms of Service and the GFiber Acceptable Use Policy prohibit users from using GFiber services for unlawful, invasive, infringing, defamatory, or fraudulent purposes, and prohibit users from placing calls in violation of marketing laws or with the intent to harass, threaten, bully, or impersonate. Violation of these terms is grounds for suspension or termination.

GFiber may suspend or terminate users for violating its terms prohibiting unlawful calls, which is an affirmative measure that GFiber may take to keep unlawful calls off of its network and to keep users safe.

Know Your Customer Practices:

To sign up for GFiber Phone services, users must provide a verified physical service address within a GFiber service eligible area and a valid form of payment. At sign up, Google or GFiber will add an authorization hold to the user’s account to ensure the payment method is active and valid. Before service activation, GFiber performs an initial construction at the verified address, ensuring the customer is tied to a specific, vetted geographic location. If a customer chooses to port an existing number, the number must originate from a vetted carrier in compliance with industry porting standards.

Know Your Upstream Provider Practices:

GFiber's upstream providers are Google and Alianza.

Google has a contractual business relationship with each upstream provider with which it interconnects. Google goes beyond conducting due diligence to ascertain the provider's identity by requiring the provider to agree to appoint a qualified employee to hold regular business review sessions with Google. During the business review sessions, the provider is required to review feedback and share ideas for service improvements. Any issues regarding suspected unlawful traffic would be reviewed in these sessions. In addition, Google requires its providers to undergo routine security reviews and penetration testing to identify vulnerabilities in providers' systems that could be exploited by bad actors.

Alianza has existing contractual agreements with Tier-1 carrier service providers from which it facilitates the provision of carrier services to GFiber. Alianza has confirmed that each of those carriers are listed in the Robocall Mitigation Database.

Other Practices to Prevent Unlawful Calls:

GFiber relies on Google's automated anti-abuse rules that track calling patterns that indicate unlawful activity, such as automated calling. Call recipients can also report to GFiber whether they have received unlawful calls. This data is tracked and used to suspend customers for violation of the law or GFiber's Acceptable Use Policy or Terms of Service.

GFiber also relies on Alianza's proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. As part of this process, Alianza notifies GFiber of potentially fraudulent activity occurring in any of its subscriber accounts. Alianza may suspend or terminate a GFiber subscriber as necessary.

Additionally, Alianza maintains and enforces a Do Not Originate (DNO) list designed to block calls from numbers that should not place outbound calls.

Description of Analytics to Block Illegal Traffic:

As noted above, GFiber relies on both Alianza and Google to identify illegal calls. Alianza and Google use their own analytics systems for tracking calling patterns that can identify illegal calls.

GFiber, Google and Alianza do not use third parties to provide such analysis.

Commitment to Respond to Traceback Requests:

GFiber is committed and has the necessary procedures in place to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any

illegal robocallers that use its service to originate calls.

This Robocall Mitigation Plan describes the specific measures that GFiber has implemented as of the date of this submission. GFiber continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.