

Robocall Mitigation Plan

Business Information

Washington Telco LLC
3201 West Nob Hill Blvd.
Yakima, WA 98902

Contact Information

Forbes Mercy
President
(509) 853-0852
forbes.mercy@washingtontelco.com

Overview

In the Commission's release, *In 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") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outlines "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" procedures;
- 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

Washington Telco LLC ("WTL") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. WTL is fully STIR/SHAKEN compliant. In compliance with the R&O, WTL submits this RMP and certification.

Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with WTL in which we transmit, originate, and/or terminate calls on behalf of the subscriber.

WTL's KYC program involves obtaining specific subscriber information before providing service. This process includes a customer vetting process in which such information as physical business location, contact person(s), state or country of incorporation, federal tax ID and nature of the customer's business is collected by WTL.

Acceptable Use Policy ("AUP")

WTL maintains an AUP that subscribers must agree to before being permitted to use WTL's network. Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable law;
- violating applicable industry accepted guidelines; and
- using WTL's service to engage in or in connection with fraudulent activities.

The AUP states that ATL may take any appropriate enforcement action, including suspension or termination of service, for violation of the AUP.

Know Your 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, WTL provides the following information concerning its upstream voice service carrier:

IPiphony
241 Applegate Terrace
Pelham, AL 35124
Dusty Wade
dwade@ipiphony.com

WTL and its upstream provider have agreed to work together to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Monitoring With Analytics

WTL works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If WTL detects a calling pattern consistent with illegal robocalls, we will identify the party and will take appropriate action. 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 system.

No third-party vendors are involved in deploying WTL's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, WTL follows certain procedures on investigating such subscribers. The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates unusual behavior;
- verifying that the call originating path is valid; and

- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

WTL follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, WTL devotes sufficient resources to provide prompt and complete resources to traceback requests. WTL will respond to traceback requests within 24 hours of being notified of same.

Blocking

WTL will implement Do Not Originate requests it receives from the ITG. WTL works with its upstream carrier to block suspicious calls. If WTL and/or its upstream carrier identify suspected robocalling patterns that are confirmed with further investigation, WTL will take appropriate action which may include suspending or terminating the subscriber's use of WTL's network. WTL will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), and the FCC, the ITG, as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. WTL will monitor industry best practices and continuously improve our 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, WTL will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

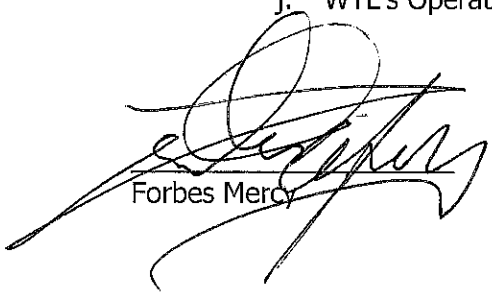
Certification of Forbes Mercy

I, Forbes Mercy, President of Washington Telco LLC ("WTL") do hereby certify, under penalty of perjury, the following:

- a. WTL is fully STIR/SHAKEN compliant
- b. WTL's business name and primary address are as follows:

Washington Telco LLC
3201 West Nob Hill Blvd.
Yakima, WA 98902

- c. WTL has no d/b/a.
- d. WTL has not previously used any other business names.
- e. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- f. Forbes Mercy owns 100% of WTL and is the sole principal of same. WTL has no subsidiaries or affiliates.
- g. WTL's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation.
- h. WTL is not prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. WTL has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. WTL's Operator Code Number is 044K.



Forbes Mercy