

Robocall Mitigation Plan
Google North America Inc.

Other DBA Names:
Google Fi, Google Fi Wireless

Google North America Inc. ("GNAI") submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii).

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

In addition to fully implementing STIR/SHAKEN pursuant to 47 CFR § 64.6301, GNAI 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 Google Fi Acceptable Use Policy prohibits users from generating or facilitating unsolicited or automated calls or to use the service for any unlawful or fraudulent purpose. Violation of these terms is grounds for suspension or termination.

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

Know Your Customer Practices:

To sign up for Google Fi Wireless (Fi), users must provide their home address and a valid form of payment. At sign up, GNAI will add an authorization hold to the user's account to ensure the payment method is active and valid. Customers who choose to finance a device through Fi must undergo a credit check.

Other Practices to Prevent Unlawful Calls:

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

Know Your Upstream Provider Practices:

GNAI and/or its affiliates ("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 annual security reviews and penetration testing to identify vulnerabilities in providers' systems that could be exploited by bad actors.

Description of Analytics to Block Illegal Traffic:

As noted above, GNAI has its own analytics systems for tracking calling patterns that can identify illegal calls. GNAI does not use any third parties to provide such analysis.

Commitment to Respond to Traceback Requests:

GNAI 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 GNAI has implemented as of the date of this submission. GNAI continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.