

Robocall Mitigation Plan

Business Information

ShareG Inc. (d/b/a GIANT)
1207 Delaware Ave #3034
Wilmington, DE 19806

Contact Information

Suruchi Gupta
CEO & Co-Founder
+1 (650) 687-7632
suruchi@giantconnect.com

Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O"), it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "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";
- 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

ShareG Inc. (d/b/a GIANT) is a small VSP dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. GIANT is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, GIANT was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as GIANT now file RMPs. This document delineates GIANT's RMP. Because GIANT does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, GIANT works closely with its upstream provider to carry out the required mitigation functions.

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 GIANT in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

GIANT's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes requiring users to provide their full name and address as listed on an identification document. We only allow SIMs to be activated on physical devices, and one SIM can only be active on one device. We require to pay upfront for one year of service and have the customers' payment information.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls, and 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, 38 FCC Rcd 5404 (2023), GIANT provides the following information concerning its upstream voice service carrier.

GIANT has one upstream provider from which it receives voice traffic:

AT&T Mobility LLC
208 S. Akard Street, Dallas, Texas 75202
Adam Panagia
Global Fraud Management
601 New Jersey Ave, NW
Suite 650
Washington DC 20001
800-337-5373
g03115@att.com

GIANT has a master service agreement with its upstream provider and has received assurances in writing from its officials that it has, and will continue to, sign calls transmitted to GIANT and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to GIANT. GIANT and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

GIANT maintains an AUP that subscribers must sign before being permitted to use GIANT'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 local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using GIANT's service to engage in or in connection with fraudulent activities.

GIANT's contractual terms with subscribers specify that GIANT may take action up to suspension or termination of service for violation of the AUP.

Mitigation During Service

GIANT works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual

numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

GIANT works with its upstream provider to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, GIANT works with its upstream provider to follow defined 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 the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Because GIANT does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in GIANT's analytics.

GIANT follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, GIANT will devote sufficient resources to provide prompt and complete resources to traceback requests. GIANT commits to responding to traceback requests fully within 24 hours.

GIANT works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to GIANT by subscribers or third parties. The investigation could potentially result in opening a traceback request or with GIANT contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated GIANT contracts governing the transport of voice calls, GIANT will endeavor to contractually require GIANT's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

GIANT will implement Do Not Originate requests it receives from ITG. GIANT's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If GIANT and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, GIANT will take appropriate action which may include suspending or terminating the subscriber's use of GIANT's service. GIANT will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. GIANT will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, GIANT 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 Suruchi Gupta

I, Suruchi Gupta, CEO & Co-Founder of ShareG Inc. (d/b/a GIANT) ("GIANT"), do hereby certify, under penalty of perjury, the following:

- (1) GIANT, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) GIANT 's Business name and primary address are as follows:

ShareG Inc. (d/b/a GIANT)
1207 Delaware Ave #3034
Wilmington, DE 19806
- (3) GIANT uses the following business names: GIANT, GIANT Protocol.
- (4) GIANT has not previously used any other business name.
- (5) Suruchi Gupta is the only person who owns more than 10% of GIANT and exercises management and control over GIANT. She has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) 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.
- (7) GIANT's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) GIANT has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) GIANT is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) GIANT is not required to have, and does not have an operating company number.

DocuSigned by:

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Suruchi Gupta