

Robocall Mitigation Plan

Business Information

Wing Tel Inc.
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Contact Information

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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

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

Know Your Customer ("KYC")

Wing Tel maintains and implements KYC procedures as part of its robocall mitigation program, designed to reasonably verify the identity and legitimacy of its customers before enabling voice

services and caller ID resources. These procedures apply to all new customers and to existing customers when there is a material change in account information or risk profile.

For business customers, Wing Tel collects and verifies information sufficient to identify the customer, locate its operations, and assess the nature and legitimacy of its anticipated traffic. At a minimum, Wing Tel obtains:

- Legal company name.
- State (or other jurisdiction) of organization and evidence of good standing from the applicable Secretary of State or equivalent authority.
- Primary business/shipping address.
- Principal place of service/use address, if different from the shipping address.
- One or more business websites or online presence, where available.

Wing Tel uses this information to confirm that the entity exists and is in good standing, that the locations are consistent with the proposed services, and that the business's stated purpose and online presence do not indicate a high risk of illegal robocall activity. Accounts that present heightened risk may be subject to additional verification, restrictions, or denial of service.

For individual/consumer customers, Wing Tel collects identifying and contact information sufficient to validate the customer's identity and service location. At a minimum, Wing Tel obtains:

- First name and last name.
- Email address.
- Telephone number.
- Shipping address and/or service address.

Wing Tel may use third-party tools or internal checks to validate address and contact information, and may request additional documentation if risk indicators are present (for example, inconsistencies between address and usage location or known fraud markers).

KYC information is retained and used in conjunction with Wing Tel's traffic monitoring and traceback obligations to facilitate rapid identification of the source of suspect calls. Where traffic patterns, traceback requests, or other indicators suggest a customer may be originating illegal robocalls, Wing Tel may re-verify KYC information, suspend or terminate service, or take other appropriate remedial actions consistent with its robocall mitigation program and applicable FCC rules.

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), Wing Tel provides the following information concerning its upstream voice service carriers.

Wing Tel receives voice traffic from multiple upstream providers, including the following:

- 1) AT&T
601 New Jersey Ave., NW
Suite 650
Washington DC 20001
Adam Panagia
g03115@att.com
- 2) T-Mobile
12920 SE 38th Street
Bellevue WA 98006
Shilpa Bhanot
RobocallMitigationSupport@T-Mobile.com
- 3) Atomic Mobile, Inc.
2407 State Route 71
Unit 856
Spring Lake NJ 07762
Brian Latchford
notifications@atomicmobile.com

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

Acceptable Use Policy ("AUP")

Wing Tel maintains an AUP that subscribers must sign before being permitted to use Wing Tel's network. Among other things, the AUP prohibits using its Services or related Software to upload, post, email, distribute, transmit, link, solicit or otherwise make available any Content or use our Services in any manner that:

1. is deceptive in a manner that is criminal or that is otherwise objectionable to us in our sole discretion, such as an offer to sell fraudulent goods or an impersonation of any person or entity or a misrepresentation of an affiliation with a person or entity;
2. specifically advertises firearms or ammunition, tobacco, alcohol, illegal drugs, or other contraband; and
3. constitutes unsolicited or unauthorized advertising, junk or bulk e-mail (SPAM), chain letters, or any other unsolicited commercial or non-commercial communication.

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

Mitigation During Service

Wing Tel works with its upstream providers 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).

Analytics for Monitoring Traffic

Wing Tel works with its upstream providers to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- recent volumes (last 60 min) vs weekly trends; 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, Wing Tel works with its upstream providers 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; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

No third-party vendors are involved in Wing Tel's traffic analytics.

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

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

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

Blocking

Wing Tel will implement Do Not Originate requests it receives from ITG. Wing Tel's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If Wing Tel and/or its upstream carriers identify suspected robocalling patterns that are confirmed with further investigation, Wing Tel will take appropriate action which may include suspending or terminating the subscriber's use of Wing Tel's service. Wing Tel 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. Wing Tel 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, Wing Tel 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 Leonid Levit

I, Leonid Levit, CEO of Wing Tel Inc. ("Wing Tel"), do hereby certify, under penalty of perjury, the following:

- (1) Wing Tel, 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) Wing Tel 's Business name and primary address are as follows:

Wing Tel Inc.
32 Broadway
Suite 514
New York, NY 10004
- (3) Wing Tel uses the following business names: Wing Tel, Wing Alpha.
- (4) Wing Tel has not previously used any other business name.
- (5) The following persons/entities own more than 10% of Wing Tel each: David Arabov and Brazda LLC.
- (6) The following individuals exercise management and control over Wing Tel: David Arabov and Leonid Levit.
- (7) Wing Tel has no subsidiaries or affiliates.
- (8) None of the persons/entities in items 5 – 6 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) 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.
- (10) Wing Tel's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (11) Wing Tel has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (12) Wing Tel is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (13) Wing Tel is not required to have, and does not have an operating company number.



Leonid Levit