

Robocall Mitigation Plan

Business Information

Mobilen Communications Inc.
3422 Old Capitol Trail
Suite 700
Wilmington, DE 19808

Contact Information

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Overview

In the Commission's recent 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;
- 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

Mobilen Communications Inc. ("Mobilen") is a VSP dedicated to stopping illegal calls from originating in our network. Because Mobilen lacks control over the necessary infrastructure to implement STIR/SHAKEN, it is exempt from same. In compliance with the R&O, Mobilen 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 Mobilen in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Mobilen's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);

- nature of the customer's business.

Additionally, Mobilen's subscribers sign enterprise contracts before utilizing Mobilen's services. Those contracts provide Mobilen with additional KYC safeguards.

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, Mobilen provides the following information concerning its upstream voice service carrier.

AT&T Enterprises, LLC
601 New Jersey Ave, NW
Suite650
Washington DC 20001
Adam Panagia
g03115@att.com

Mobilen has a master service agreement with AT&T and has received assurances from their officials they have, and will continue to, sign calls transmitted to Mobilen and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Mobilen. Mobilen 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")

Mobilen maintains an AUP that subscribers must agree to before being permitted to use Mobilen's network. A link to that AUP is here: <https://mobilen.com/terms-of-use/>

Analytics for Monitoring Traffic

Mobilen works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls 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 network.

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

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted, which follows the 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 or her particular use case and validate that the activity belongs to that subscriber.

Mobilen follows Industry Traceback Group (“ITG”)-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Mobilen will devote sufficient resources to provide prompt and complete resources to traceback requests. Mobilen certifies that it will respond to all traceback requests within 24 hours of receiving same.

Blocking

Mobilen will promptly respond to Do Not Originate requests it receives from the ITG. Mobilen has mechanisms to automatically block suspicious calls using internal analytics. If Mobilen’s monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Mobilen will take appropriate action which may include suspending or terminating the subscriber’s use of Mobilen’s network. Mobilen will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Mobilen 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, Mobilen 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 Christopher Stojcev

I, Christopher Stojcev, Chief Executive Officer of Mobilen Communications Inc. ("Mobilen") do hereby certify, under penalty of perjury, the following:

(1) Mobilen's business name and primary address are as follows:

Mobilen Communications Inc.
3422 Old Capitol Trail
Suite 700
Wilmington, DE 19808

- (2) Mobilen has no other business names in use.
- (3) Mobilen has not previously used any other business name.
- (4) The following person owns more than 10% of Mobilen: Christopher Stojcev.
- (5) Mobilen has no affiliates or subsidiaries.
- (6) None of the persons/entities listed herein have had their license denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (7) 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.
- (8) Mobilen's role in the call chain is that of a voice service provider without a STIR/SHAKEN implementation obligation serving end-users.
- (9) Mobilen has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (10) Mobilen is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) Mobilen does not have, and is not required to have, an Operator Code Number.

/s/ Christopher Stojcev