

Gold Security Corporation Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Gold Security Corporation pursuant to the provisions of 47 C.F.R. § 64.6305, as adopted by the Federal Communications Commission (FCC). Gold Security Corporation is a reseller of AT&T Mobility wireless voice services. This document sets forth the Provider's current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating through its service. The Provider views these policies and procedures as constituting "reasonable steps" to avoid the origination of illegal robocalls through its service and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC's Robocall Mitigation Database, the Provider's status with respect to STIR-SHAKEN implementation is as follows:

- The Provider has not implemented the STIR/SHAKEN authentication framework on any portion of its operations and all calls originating through its service are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Provider's service to originate illegal robocalls. Presently, the Provider relies on AT&T Mobility as its underlying carrier for all call transmission, signaling, and authentication. All transmission and authentication of voice services occur on AT&T's network using AT&T's infrastructure and certificates. This filing is consistent with Enforcement Advisory DA 26-174, which recognizes that voice service providers, including resellers, without the facilities necessary to implement STIR/SHAKEN must still take reasonable steps to mitigate illegal robocall traffic through other means.

II. TRACEBACK REQUESTS

As noted above, the Provider will cooperate with the FCC, law enforcement and the ITG on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback request received within 24 hours after receiving the same. Within Appendix A to this Plan, the Provider identifies a single point of contact for receiving all traceback requests.

III. CUSTOMER VETTING PRACTICES

As a voice service provider serving end users, the Provider takes affirmative, effective measures to know its customers pursuant to 47 C.F.R. § 64.1200(n)(4) and to prevent new and renewing customers from using its service to originate illegal calls. The Provider's Know-Your-Customer (KYC) process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship.

At this time, the Provider serves only business customers. As part of its customer vetting process, the Provider takes affirmative measures to know its customers and exercises due diligence consistent with 47 C.F.R. § 64.1200(n)(4) in order to prevent new and renewing customers from using its service to originate illegal calls. The Provider vets prospective customers to ensure they are reputable, established businesses and carefully evaluates the intended use of the wireless voice service. These efforts occur during the process of provisioning services and executing service agreements.

The Provider will cooperate with AT&T to promptly investigate any suspicious calling patterns, taking appropriate action, which may include suspension or termination of service where warranted. The Provider relies on AT&T Mobility for any network-level call analytics or blocking capabilities.

IV. ONGOING ROBOCALL MITIGATION PRACTICES

The Provider is committed to the ongoing prevention of illegal robocalls through its customer vetting practices, monitoring of customer activity, and prompt cooperation with traceback requests. The Provider will update this plan as necessary and will recertify its RMD filing annually as required.

Appendix A

Traceback Request Single Point of Contact:

Name: Joshua Billings

Phone Number: (816) 235-3810

Email Address: joshua.billings@goldkey.com

Underlying Carrier:

AT&T Mobility