

Robocall Mitigation Plan for Zingo Media Group LLC

Introduction

Zingo Media Group LLC ("ZMG"), is a small UCaaS Provider and is committed to mitigating unlawful robocalls and complying with Federal Communications Commission (FCC) regulations. As a small provider, ZMG relies on any underlying providers for call termination services, DID origination services, and STIR/SHAKEN attestation. This document outlines ZMG's comprehensive Robocall Mitigation Plan, ensuring full compliance with the FCC's amended requirements under section 64.6305.

1. Contact Information

Zingo Media Group LLC: Zingo Media Group LLC

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Principals, Affiliates, Subsidiaries, and Parent Companies:

- Srinivas Gudavalli
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2. Implementation of STIR/SHAKEN Framework

Zingo Media Group LLC complies with the STIR/SHAKEN call authentication framework through its partnership with VoIP Innovations. This partnership ensures that:

- All outbound calls are attested under the STIR/SHAKEN framework.
- Calls originating from our network are validated to verify caller identity and detect spoofed calls.
- Zingo Media Group LLC's customers benefit from the enhanced trust and call integrity provided by STIR/SHAKEN.

ZMG's underlying carrier is responsible for generating and transmitting appropriate attestation levels (A, B, or C) for calls originating from our network, in compliance with industry standards and FCC guidelines. For example, calls sent through the network with ZMG's DIDs assigned by their underlying providers are appropriately signed as attestation level A. ZMG confirms that no previous certification has been removed by Commission action.

3. Robocall Monitoring and Mitigation

ZMG actively works to prevent illegal robocalls from originating or transiting through its network. Our approach includes:

- **Traffic Monitoring:**
 - Monitoring call patterns for anomalies, such as high call volumes to specific destinations or short-duration calls.
 - Investigating and addressing suspicious activity promptly.
- **Customer Vetting:**
 - Verifying the identity of new customers and assessing the legitimacy of their intended usage.
 - Ensuring that customers agree to terms prohibiting illegal robocalling.
 - Taking reasonable steps to prevent new and renewing customers from originating illegal robocalls.
- **Complaint Resolution:**
 - Providing a clear process for individuals to report suspected robocalls.
 - Investigating complaints and taking corrective actions, including termination of services for violators.

3.5 Know Your Customer (KYC) Procedures (Performed In-House)

Zingo Media Group LLC conducts its own internal Know Your Customer (KYC) process for all new customers and customer renewals to ensure that only legitimate entities and individuals are granted access to origination services capable of making high volumes of outbound calls or using numbering resources. Our in-house KYC procedures include the following reasonable and risk-based steps:

- **Collection and Verification of Customer Information** At account signup or upon any material change in service usage, ZMG requires and collects:
 - Full legal name of the individual or entity
 - Physical business address (no P.O. boxes accepted for high-volume or toll-free services)
 - Business identification number (EIN, or equivalent tax ID for non-U.S. entities) or, for individuals, the last four digits of SSN or government-issued ID number
 - At least one valid government-issued photo ID for the account owner or authorized officer
 - Business website, or if none exists, a description of the legitimate business purpose for the service
- **Verification Steps Performed In-House** ZMG staff manually verify the provided information by:

- Cross-referencing the business name and EIN against public state business registry databases or IRS records where available
- Confirming the provided physical address via USPS address validation tools and third-party data sources (e.g., Google Maps satellite/street view confirmation)
- Verifying that the submitted photo ID matches the name and appears authentic
- Conducting an open-source and web search for the customer and principals to identify any prior association with illegal robocalling, call spoofing, or inclusion on the Industry Traceback Group's known bad-actor list
- **Red-Flag Review and Enhanced Due Diligence** If any of the following risk indicators are present, ZMG performs enhanced in-house due diligence before activating or continuing service:
 - Customer is unwilling or unable to provide complete KYC information
 - Discrepancies between provided information and public records
 - Use of privacy-protected or anonymous registration services for domains/websites
 - Requested usage patterns inconsistent with stated business purpose (e.g., high-volume outbound with no apparent legitimate need)
 - Prior complaints or traceback involvement linked to the customer or its principals
- **Acceptance of Terms Prohibiting Illegal Activity** All customers must electronically acknowledge and agree to ZMG's Acceptable Use Policy and Robocall Policy, which explicitly prohibit the origination or facilitation of illegal robocalls, unlawful caller ID spoofing, or any violation of the Telephone Consumer Protection Act (TCPA) or Telemarketing Sales Rule (TSR).
- **Ongoing Monitoring and Re-Vetting** Existing customers are subject to periodic re-vetting (at least annually for high-volume or toll-free customers) and immediate re-review upon receipt of complaints, traceback requests, or detected anomalous traffic patterns.

These in-house KYC measures, combined with the other elements of this Robocall Mitigation Plan, satisfy the FCC's requirement that Zingo Media Group LLC take reasonable steps to prevent new and existing customers from using its network to originate illegal robocalls.

4. Call Analytics and Upstream Provider Procedures

- **Call Analytics:**
 - ZMG employs third-party call analytics systems provided by underlying carriers to detect and mitigate suspected illegal robocall traffic, as ZMG is a small provider and

does not have the need to maintain their own Class 4 switch platform or least cost routing.

- These systems analyze call patterns in real-time to identify potential violations.

- **Upstream Provider Procedures:**

- ZMG ensures that all upstream providers comply with FCC regulations and maintain updated RMD certifications.
 - Periodic reviews of upstream providers' practices are conducted to verify compliance.
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5. Compliance with FCC Requirements

ZMG complies with all FCC rules and regulations regarding robocall mitigation, including:

- Filing certification and supporting documentation in the FCC's Robocall Mitigation Database (RMD).
 - Ensuring that all required information, including our role in the call chain and details of STIR/SHAKEN implementation, is provided and updated promptly.
 - Affirming that neither ZMG nor any affiliated entity has been subject to Commission or law enforcement action related to illegal robocalling, spoofing, or RMD certification deficiencies in the past two years.
 - Committing to respond fully to traceback requests within 24 hours when emailed by the US Telecom ITG (Industry Traceback group).
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6. Future Enhancements

ZMG is committed to improving its robocall mitigation efforts over time. Planned enhancements include:

- Deploying advanced analytics tools to identify and block suspicious traffic more effectively.
 - Expanding customer education programs to raise awareness about robocalls and how to report them.
 - Strengthening partnerships with industry organizations and regulators to stay ahead of emerging robocall trends.
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7. Commitment to Correct Deficiencies

ZMG will respond promptly to any FCC notice of deficiency in its RMD certification. This includes:

- Updating RMD certifications and robocall mitigation plans to cure identified deficiencies.

- Providing detailed explanations to the FCC regarding corrective actions taken.
- Ensuring compliance within the specified timeframe to avoid removal from the RMD.

Conclusion

Zingo Media Group LLC is dedicated to protecting its customers and the public from the harm caused by illegal robocalls. Through robust partnerships, compliance with FCC regulations, and continuous improvement, ZMG ensures a secure and reliable voice service for its customers.