

Big authoritative
data, when applied
correctly, empowers
companies to Know
Their Customers
Better



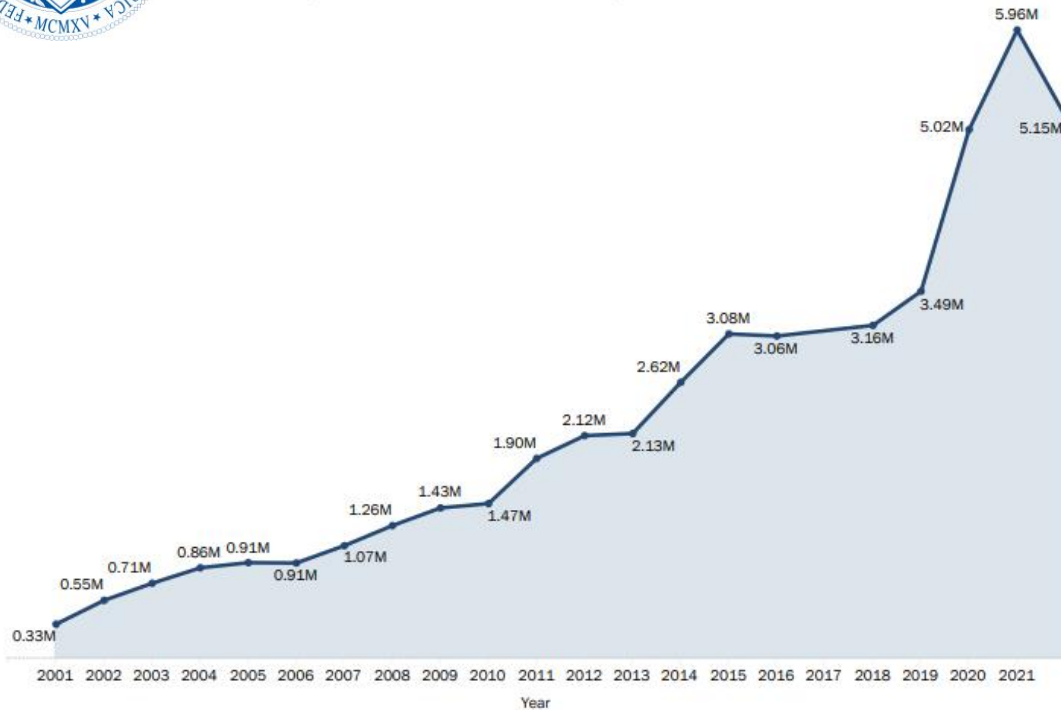
Mike Rudolph - YouMail

Jaime Zetterstrom - Somos

Why Are We Here?



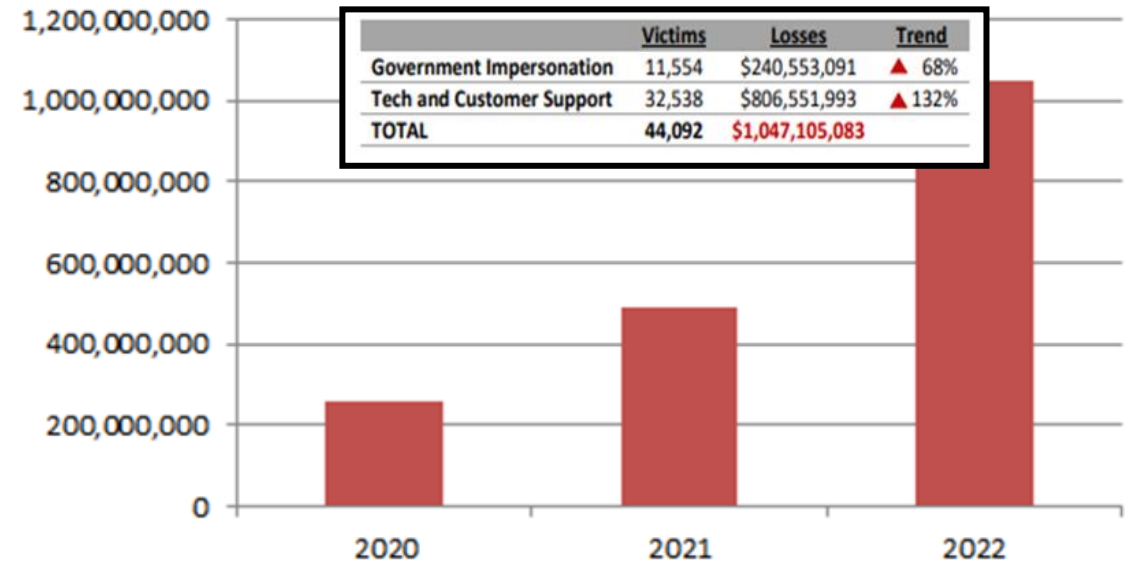
FTC CSN – Reports & Losses 2022
Calls & SMS: \$1.1 Billion in 600,000 reports



<https://www.ftc.gov/reports/consumer-sentinel-network-data-book-2022>



FBI IC3 – Imposter Losses 2022
132% increase to \$1+ Billion



	Victims	Losses	Trend
Government Impersonation	11,554	\$240,553,091	▲ 68%
Tech and Customer Support	32,538	\$806,551,993	▲ 132%
TOTAL	44,092	\$1,047,105,083	

https://www.ic3.gov/Media/PDF/AnnualReport/2022_IC3Report.pdf



Phone Numbers : Weapons In The Wrong Hands



Communications Providers : Gatekeepers & Screening Agents

FTC – Apr 2023 – “Project PoNE”

2022 May-Aug

14 providers received C&Ds

2023 Mar-Apr & counting

10 providers received C&Ds

24 providers told:

“you are apparently routing and transmitting robocall traffic knowingly”



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Cleveland, Ohio 44114
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United States of America
FEDERAL TRADE COMMISSION
East Central Region

Jon Miller Steiger
Director

March 17, 2023

CEASE AND DESIST DEMAND

We have determined that *YOUR NETWORK* is apparently routing and transmitting illegal robocall traffic, directly or indirectly, for entities involved in the following campaigns:

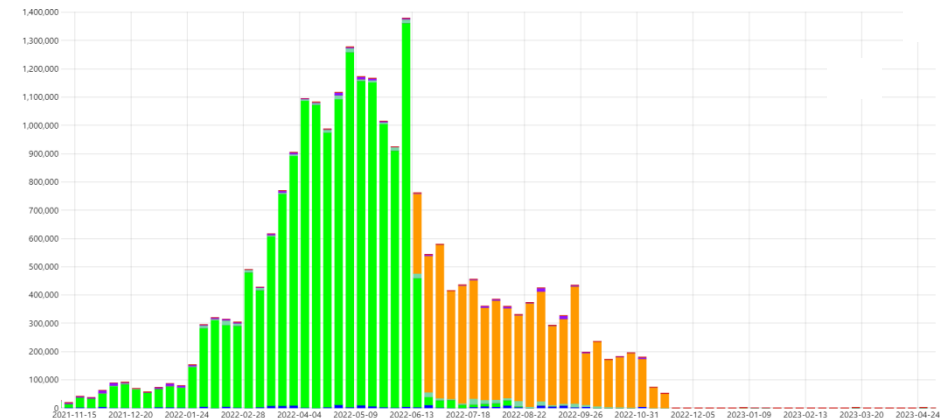
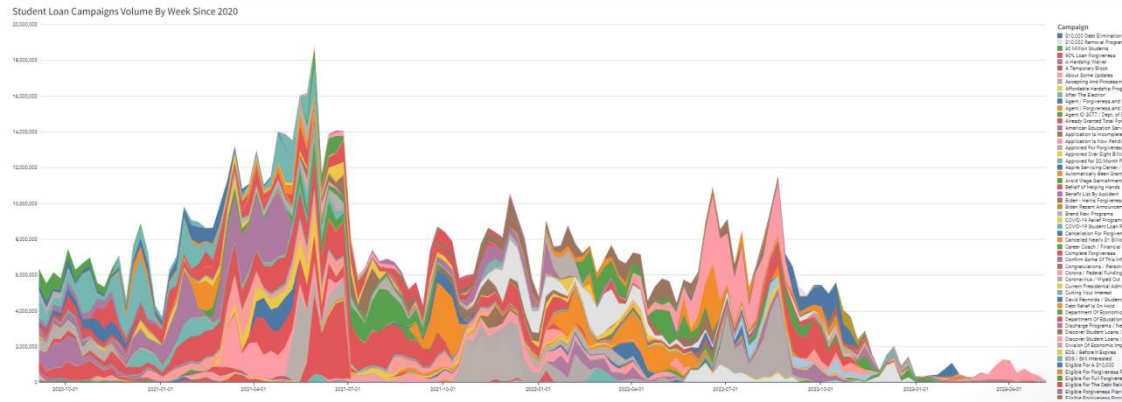
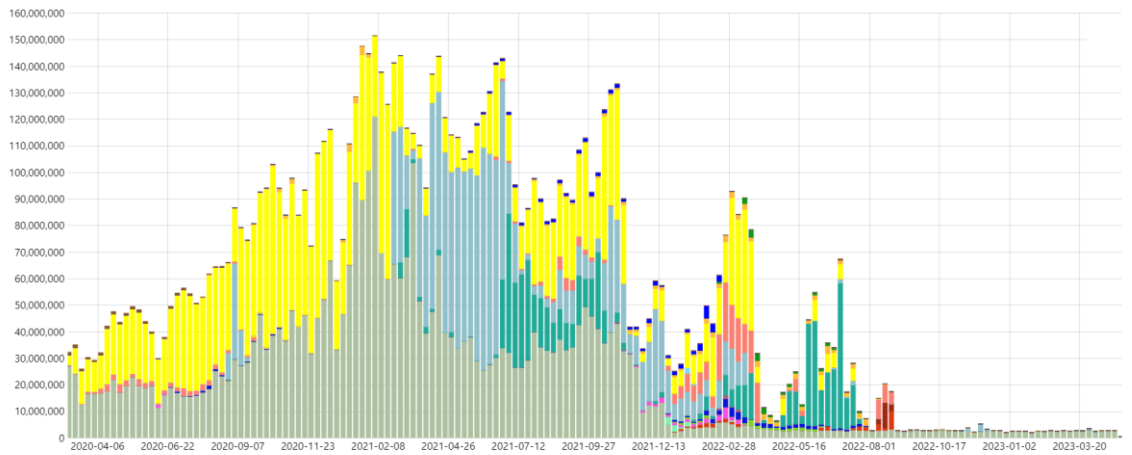
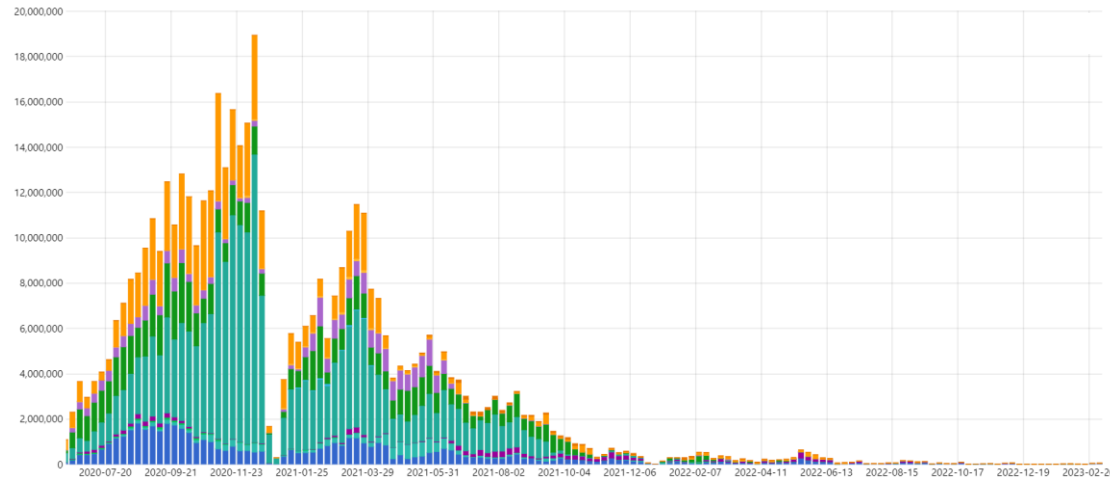
- Amazon – AuthorizeOrder
- AutoWarranty-Extend
- AutoWarranty-ExtendOrReinstate
- SolarEnergyAdvocates
- SSA-TexasGovtImpersonation

More specifically, our investigation revealed *YOUR NETWORK* routed and transmitted illegal robocalls, as set for in Attachment A.

The FTC works closely with the ITG to conduct tracebacks. Between *DATE* and *DATE*, ITG investigated *XX* prerecorded messages that law enforcement, voice service honeypots and customers of YouMail had flagged as illegal robocalls made without the consent of the called party.

Further the numerous traceback notices directed to *YOUR NETWORK* indicate that you are apparently routing and transmitting illegal robocall traffic knowingly. **IF YOU ARE ENGAGED IN THESE ACTIVITIES YOU MUST IMMEDIATELY CEASE AND DESIST FROM ENGAGING IN THEM.**

FCC – 2022 – Sweeping Enforcement Actions



Increasing Targeted Enforcements Are Achieving Results

June 21, 2022: Stop or be “deemed to have *knowingly* and *willfully* engaged in transmitting unlawful robocalls.”

FCC - May 2023 – Seventh Report & Order

Know Your Upstream Provider

48. We require all voice service providers accepting traffic from an upstream provider to take steps to “know” that immediate upstream provider.

This extends our existing requirement for gateway providers to all voice service providers; it holds all voice service providers in the call path responsible for the calls that transit their networks.

Specifically, we require every voice service provider to take reasonable and effective steps to ensure that the immediate upstream provider is not using it to carry or process a high volume of illegal traffic. We therefore agree with commenters urging us to adopt a rule that would hold all providers in the call path responsible for the traffic that transits their network. We agree with USTelecom that the best method to do so is by adopting a know-your-upstream-provider requirement.

FCC - May 2023 – Seventh Report & Order

Know Your Upstream Provider

49. [...] the Commission cannot permit them to “intentionally or negligently ignore red flags from their upstream providers [...] all voice service providers in the call path are responsible for keeping illegal traffic off the U.S. network.

[..]

.. all voice service providers must take effective steps, and if a voice service provider carriers or transmits a high volume of illegal traffic that primarily originates from one or more specific upstream providers, the steps that provider has taken are not effective and must be modified for that provider to be in compliance with our rules. We encourage voice service providers to regularly evaluate and adjust their approach so that that it remains effective.

FCC - May 2023 – Seventh Report & Order

33. With these modifications to our rules, all traffic that transits the U.S. network will be subject to our blocking requirements, even if non-gateway intermediate providers are not generally required to block.

40. We make clear that the **requirement to block on an ongoing basis is not tied to the number** in the caller ID field or any other single criterion. Instead, we require the notified provider to block on a continuing basis any traffic that is substantially similar to the identified traffic and provide the Enforcement Bureau with a plan as to how it expects to do so.

and in the Eighth Notice Of Proposed Rulemaking...

101. [...] if a voice service provider allows that customer to originate illegal calls over the course of several days, should we consider this a continuing violation such that we may impose a forfeiture of up to \$23,727 per day?

States & Anti-Robocall Task Force

May 23 2023 : Task Force's First Lawsuit

6 Pages Of "Marketing" Signaling

8 Pages Of Questionable "Consent Data"

(Jobs->Senior Aid->Loans)

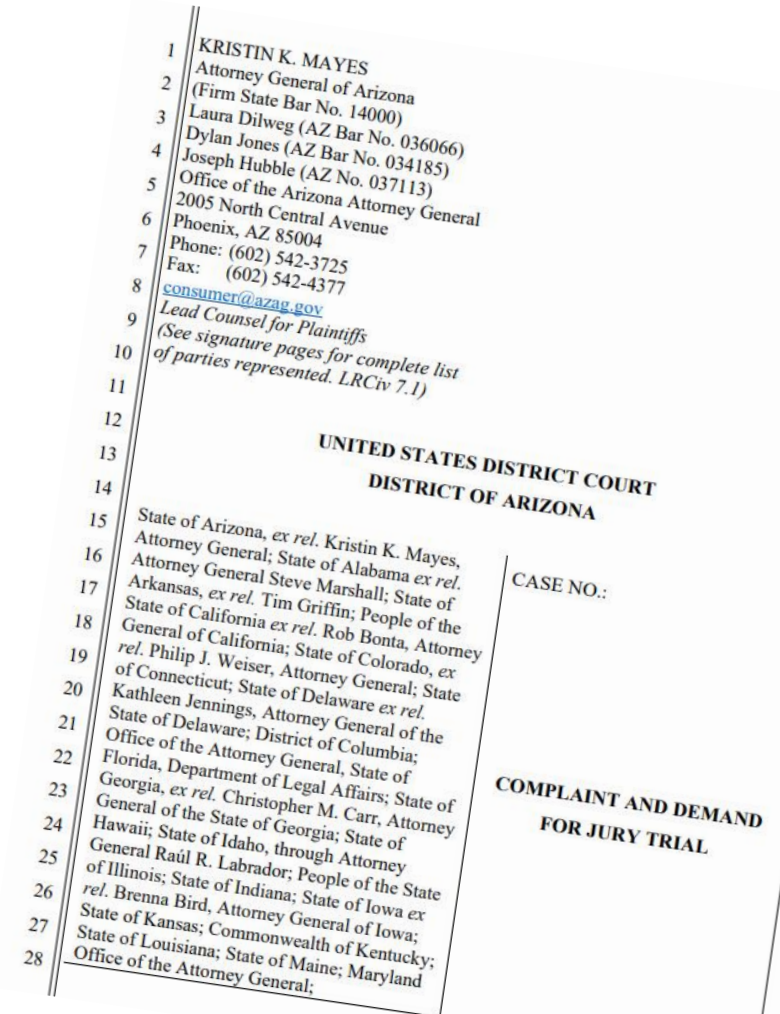
329 Tracebacks : 40 Up/Down Providers

Years Of "Back & Forth" Conversations

21.5B calls using 1.3B originating numbers

155.4M or more invalid numbers

DNO Abuse: 23 Gov. Agencies, 17 FIs/Banks



States & Anti-Robocall Task Force

Mar 6 2023 : 8-State Settlement

Screening of Current & Prospective Customers (“KYC Blueprint”)

- Names, DBAs, addresses, websites, numbers & email, principals/majority owners
- Business description and nature of goods
- DNC account number, USF number, FCC forms, Federal Taxpayer ID
- IP addresses used by employees, contractors
- Bank references (when credit card used over wire/ACH payment)
- Copies of practices & policies for
 - compliance/training on TSR, TCPA
 - traceback responses + 18 month history
 - identifying & blocking robocalls
 - obtaining prior express written authorization for robocalls
- Sample transcripts of all messages for prior 6 months (with 7-day notice on changes)
- A list of all such customers called within prior 6 months (and actual proof of auth.)
- Reasonable screenings recur annually

Use & Act On Available Evidence To “KYC”

When you're aware of unlawful behavior from numbers ..

“the steps that have been taken are not effective and must be modified”

Don't block numbers, block all **“substantially similar”** traffic

When a bad actor / provider is cut off, they are immediately searching for new homes -> dozens or more providers will see them as sales leads

Ask questions : Recent notices or shutdowns?

Providers must constantly innovate - bad actor originators
are rapidly learning, optimizing & evolving.

Better, faster data provides the advantage.

We Use Data Everyday



TRUST

Analytics

Know Your Customer Better

Hi! We're Somos!

Somos Numbering Administration: *On behalf of the FCC*



Somos empowers more trusted connections between brands,
consumers and communities

**Current North American Numbering
Plan Administrator supporting
over 1,400+ Service Providers
and managing over
7 billion identities in inventory**

Industry Engagement



NANC-Chair



SIPFORUM

USTELECOM
THE BROADBAND ASSOCIATION

RealNumber[®] DNO

28 MILLION

Auto Set Toll-Free Numbers

3.0 MILLION

Manually Set Toll-Free & Local Numbers

6+ BILLION

Auto Set Local Numbers

(Includes Current ITG DNO Numbers)

RealNumber[®] DNO

Leading Wireless Provider

90%

Reduction in Reported
Robocalls

Tier 1 Carrier

3%

Hit Rate Upon
Implementation

Gateway Provider

17%

Hit Rate Upon
Implementation

2023

10%

of ITG Tracebacks were
on RealNumber DNO List

RealNumber[®] DNO for Text



Most Robust
Dataset of DNO for
Text in the industry



Compliance with
FCC Report & Order

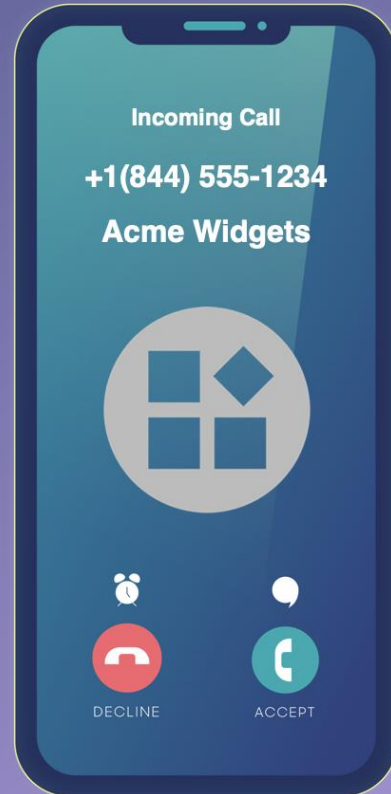


Transition to Call Authentication



+1(844) 555-1234

TN Validation



Acme Widgets

Caller Authentication



Achieving Trust

Consistency in the implementation of call authentication and associated policies for determining trust:

To identify:

- ✓ The caller
- ✓ The business of the caller

To have confidence, the caller:

- ✓ Has been vetted
- ✓ Has committed to following policies
- ✓ Has passed compliance checks



To move from a “please trust me” model

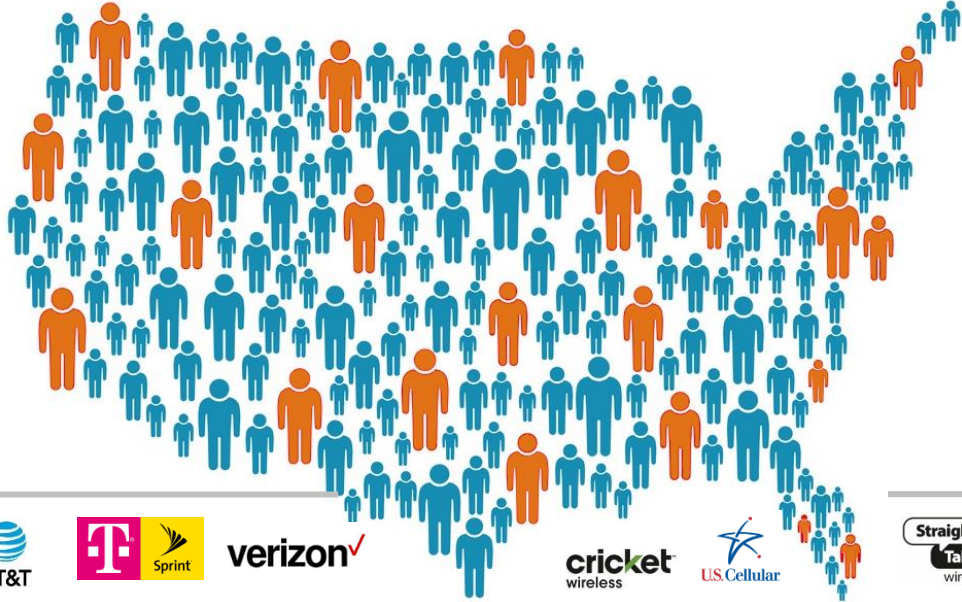
To a “proof of compliance” model



In Case You Don't Know YouMail



YPS Sensor Network : Number Data



ATT Free Msg: December bill is paid. Thanks, here's a little gift for you: [redacted] Happy new year!

Transaction Update: Your account is being debited for iPhone 13 USD \$599.97. Not you? Call Amazon at (888)***-****



CALLER: Social Security
FROM: (855) 555-1234
TO: (310) 555-9999

Today
1:35 PM

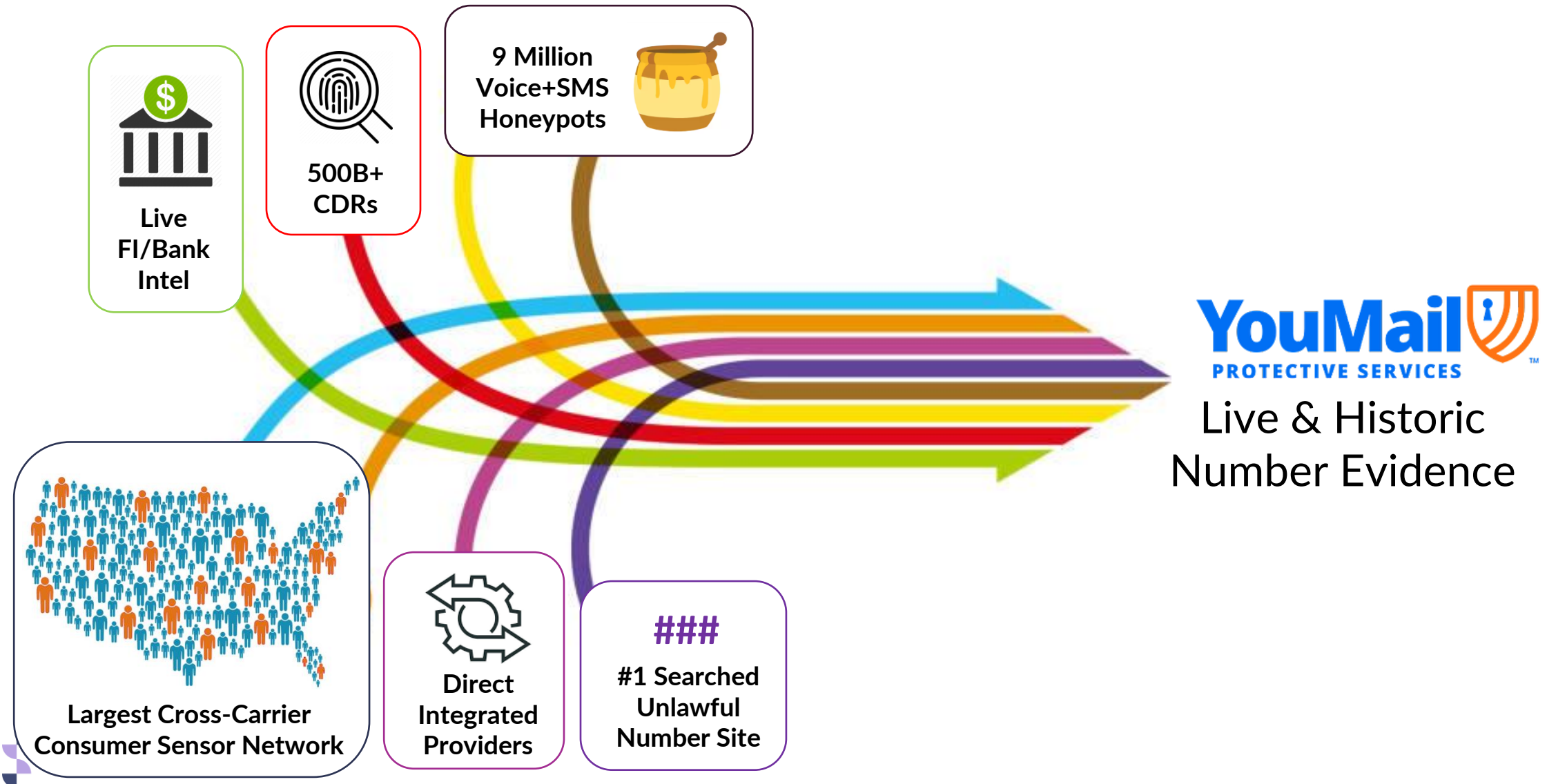
"This message from the **Social Security Administration** is regarding an enforcement action filed by the Department of Treasury on your social security .."



Real Consumers. Real Evidence.



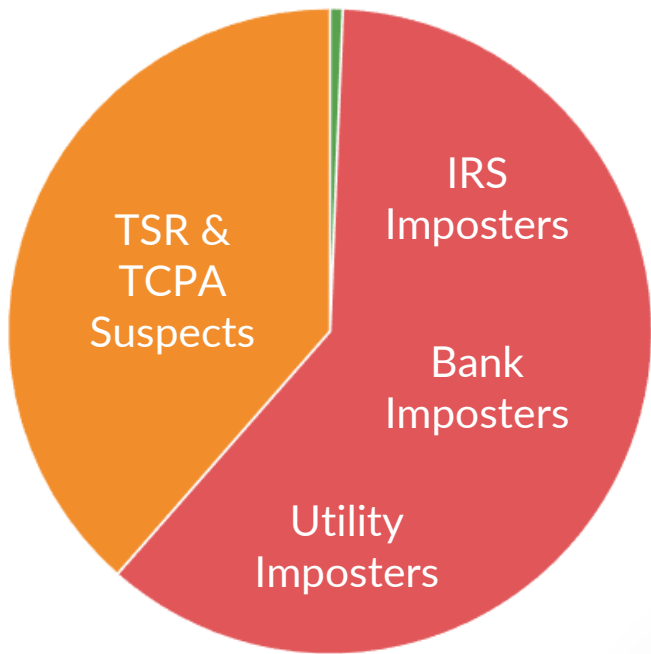
YPS Expanded Number Evidence & Data



“Know” With Live Data + Evidence

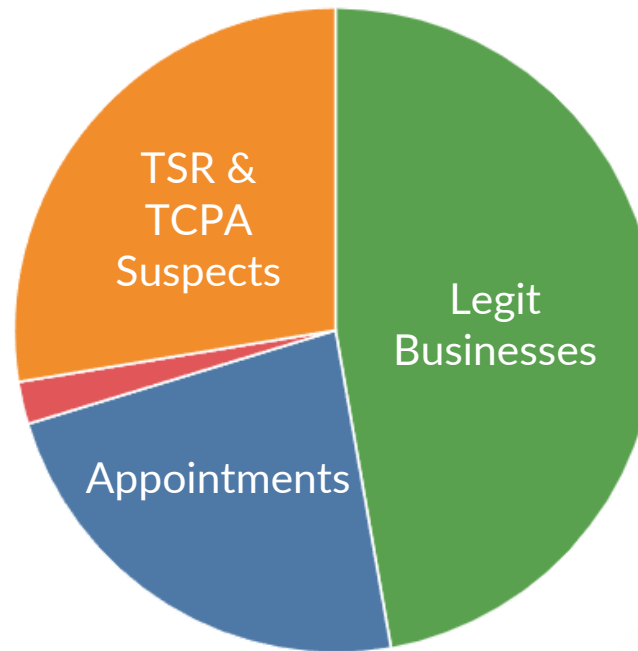
Provider #1

99% fraud/suspect
<1% known good



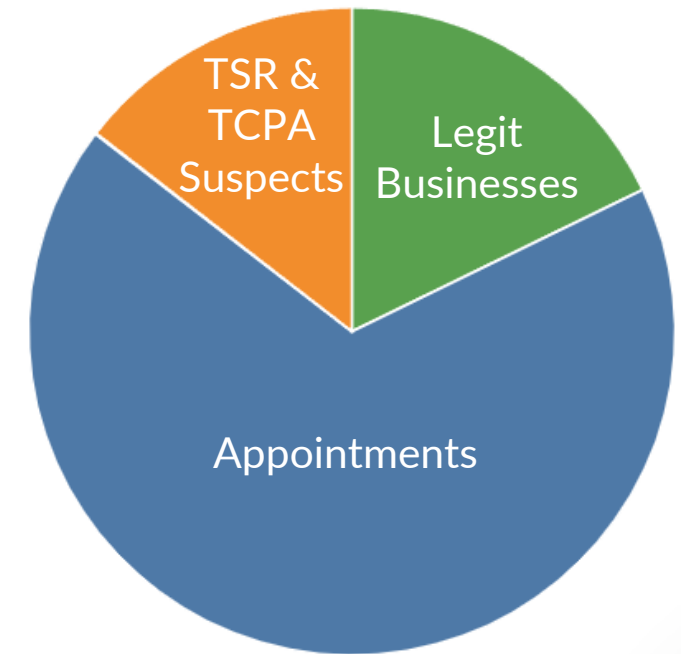
Provider #2

Risking good business
mixed w/fraud




Provider #3

Near-zero risk
if telemarketing vetted



 Very Likely Fraud


 Telemarketing
Needing Review

 Very Likely Legal
Telemarketing

Legal Robocalls

Know Better With Live Data & Evidence

KYC

Know Your Customer

KYC Information

Name: John Smith
Email: smith.46@gmail.com
Company: Wells Health LLC
IP: 128.97.1.1
IP Details: TunnelVPN

Email from

smith874@gmail.com

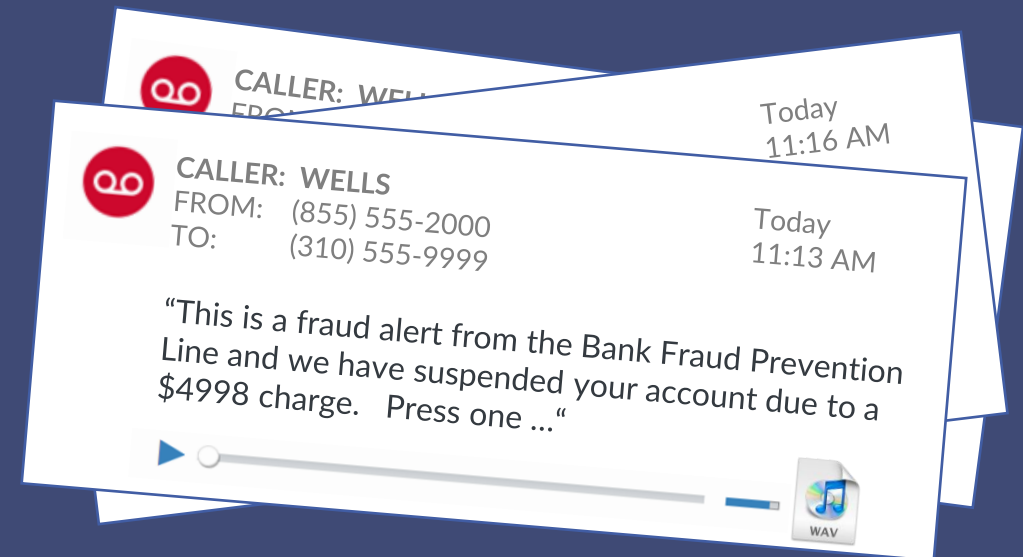
Hi, we are a medical device company and we are planning on making several thousand calls per day to our distributors. Thanks.

KYC + KYT + KYUP

Know Your Customer

Know Your Traffic

Know Your Upstream Provider



Somos and YouMail Can Help You Know Your Customer Better