

August 20, 2024  
Via ECFS Filing

Secretary, Federal Communications Commission  
Washington, DC 20554  
Attn: Wireline Competition Bureau

**RE: Supplemental Application of ALLO Communications LLC for Authorization to Obtain Numbering Resources Pursuant to Section 52.15(g) of the Commission's Rules, WC Docket No. 24-**

Dear Ms. Dortch,

Pursuant to Section §52.15(g)(3)(i) of the Commission's Rules,<sup>1</sup> ALLO Communications LLC (the "Company") hereby submits supplemental information to the Application for Authorization to Obtain Numbering Resources that was originally filed April 25, 2024 based upon an email from staff.

In support of its application the Company certifies the following:

ALLO Communications LLC has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database as required by §§ 64.6301 to 64.6305. The Company will provide the necessary "KYC" documentation for their customers as required by STI-GA Authorities. In addition, ALLO Communications LLC will pass the STIR/SHAKEN certificate, without modification, to each carrier with which it exchanges call traffic. A copy of the filed Robocall Mitigation Database documentation is attached as **Exhibit A**

ALLO Communications LLC is committed to providing full support for their customers concerning Robocall Mitigation and call Blocking where appropriate. The Company certifies that it will not use the numbers obtained pursuant to an authorization to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under §§ 64.1200, 64.1604, and 64.6300 et seq. of this chapter, and 16 CFR 310.3(b).

Any questions you may have regarding this filing should be directed to my attention at 470-672-3933 or via email to nfernandez@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Nelson Fernandez

Nelson Fernandez  
Consultant

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<sup>1</sup> 47 C.F.R. § 52.15(g).

## EXHIBIT A

Robocall Mitigation Program  
ALLO Communications LLC  
FRN 0010480978

FCC Public Notice DA 24-73 announces the Robocall Mitigation Database filing deadlines and additional compliance instructions. Allo Communications is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. As of 12/31/2021 ALLO Communications has implemented STIR/SHAKEN in conjunction with Neustar/Transunion on the IP portions of the Allo Communications voice network. In addition to STIR/SHAKEN, Allo performs robocall mitigation for all IP and TDM voice traffic.

This document provides the additional information required by FCC Public Notice DA 24-73 and defines the ALLO Robocall Mitigation Program that ALLO Communications will be following to combat unlawful Robocalls in accordance with the FCC Robocall Mitigation and certification requirements.

Additional Information required by FCC Public Notice DA 24-73

- 1) Allo Communications is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- 2) Allo claims no extension for the STIR/SHAKEN implementation.
- 3) No additional Principals, Affiliates, Subsidiaries, Parent Companies other than Allo Communications.
- 4) Allo Communications is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing and provide information concerning any such actions or investigations.
- 5) Allo Communications OCN is 710A

ALLO Robocall Mitigation Program

1) Measures to prevent the origination of illegal robocalls

- Neustar Robocall Mitigation service  
Using the existing Neustar CNAM infrastructure and data analytics, this service identifies invalid and unassigned telephone numbers for authoritative blacklist as well as identifying legitimate telephone numbers for authoritative whitelist.
- Metaswitch source based translations mitigation  
Using the Metaswitch files based dynamic translations, this service blocks the following types of calls from originating or terminating on the ALLO network.
  - Invalid non-Telcordia formatted telephone numbers
  - Poorly rated telephone numbers (99-100) based on Neustar CNAM analytics
  - Any illegal robocallers or TDOS attackers based on validated reports
- Additional mitigation services being implemented
  - Neustar Strategic Caller
  - Neustar STIR/SHAKEN call authentication

- Equinox Protector analytics service (live call pattern monitoring)
- Provisioning processes and database monitoring
  - ALLO subscriber Calling Party Numbers must be ALLO owned telephone numbers.
  - ALLO PBX business/enterprise customers must include ALLO owned telephone numbers in P-Asserted ID of call. Calling Party Numbers must be owned by the respective business/enterprise.
- End-user customer validation, vetting, and contractual provisions
  - All end-user customers are vetted for reputation at time of contract origination and renewal.
  - Business/enterprise customers must prove ownership of any non-ALLO phone numbers to be used in call processing.

## 2) ALLO Response to Traceback Requests

- ALLO participates in the Industry Traceback Group/Consortium. Allo commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers.
- ALLO has a process in place to investigate and identify fraudulent calls originating on the ALLO network whether they be identified via Traceback or through pre-emptive monitoring.

## 3) ALLO commitment and cooperation to stop illegal robocallers

- ALLO commits to block any customer from originating illegal calls on the ALLO network.
- Any ALLO customer that is identified as an illegal robocaller will be suspended from originating calls on the ALLO network.
- The Metaswitch source based translations mitigation allows ALLO to block any telephone number identified as an illegal robocaller from completing calls either originating or terminating on the ALLO network.

## 4) Universal Robocall Mitigation Database Filing Obligation

- All calls that Allo originate on our network are subject to our robocall mitigation program.
- No prior certification has been removed by Commission action and Allo has not been prohibited from filing in the Robocall Mitigation Database. Allo has fully implemented STIR/SHAKEN on the IP portions of our voice networks.
- Allo's robocall mitigation plan describes the specific "reasonable steps" Allo has taken to avoid the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation program as described in FCC Public Notices DA 21-454 and DA 24-73.