

Race Telecommunications, LLC – Robocall Mitigation Plan

Race Telecommunications, LLC. (“Race”) submits this Robocall Mitigation Plan (“Plan”) pursuant to 47 C.F.R. § 64.6305. This Plan describes Race’s efforts to mitigate illegal robocalls consistent with the FCC’s rules. Race may modify, add, delete, or otherwise alter any part of this Plan to respond to changes in its business, technologies, needs, industry best practices, or applicable law or regulation. Race will update this Plan within ten (10) business days following the date of any changes to the Plan.

Implementation of STIR/SHAKEN

Race has fully implemented STIR/SHAKEN and has submitted certifications in the Federal Communications Commission (“FCC” or “Commission”) Robocall Mitigation Database stating that all voice traffic originating on Race’s network is authenticated with STIR/SHAKEN consistent with 47 C.F.R. § 64.6301(a).

Robocall Mitigation Plan

All voice traffic that originates on Race’s network is subject to the following Robocall Mitigation Plan.

Call Analytics

Race uses TNS’ Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. Race has also deployed call authentication, call labeling, and call blocking services provided by TNS.

Race blocks the following types of calls by default:

- Calls originating from invalid numbers (per FCC requirements/orders, as applicable).
- Calls from Do-Not-Originate (“DNO”) numbers (per FCC requirements/orders, as applicable).

Investigation

Race investigates calls identified by TNS as suspicious calls or those exhibiting abnormal call volumes, patterns, or activity consistent with illegal robocalls. If Race has any other reason to suspect illegal robocalling or spoofing is occurring over its network, Race will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action.

Enforcement

Illegal robocalls and fraudulent spoofing are prohibited on our network. If Race determines a Race customer is using the network to fraudulently spoof calls or to originate illegal robocalls, Race will either warn the customer to stop such practices or terminate their service in accordance with Race Policy.

Know Your Customer

Race has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. Race thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Upstream Provider Knowledge

Race knows the carriers from which it receives traffic and has confirmed that upstream providers are appropriately listed in the Robocall Mitigation Database. Race does not directly receive traffic from any foreign originating or intermediate provider. No provider is using the Race network to carry or process a high volume of illegal traffic.

Role In the Call Chain

Race is a voice service provider with a STIR/SHAKEN obligation serving end-users. Race is also a voice service provider without a STIR/SHAKEN obligation on the non-IP portions of its network because that portion of the network relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls. Race provides services directly to end users and does not play a role as an intermediate provider.

Traceback

Race commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocall activity that may be using our services. Race will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Race has never been involved in any formal law enforcement or regulatory investigation into suspected unlawful robocalling. Race has not been prohibited from filing in the Robocall Mitigation Database (RMD).

Customer Education

Race posts information on its website to educate customers on how to protect themselves from unlawful robocalls and provides a process for reporting complaints related to robocall activity.