



Red Telecom LLC,
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Robocall Mitigation Procedure:

Red Telecom is a wholesale carrier, reselling international and US Domestic telephone calls to both foreign and domestic carriers. In compliance with 47 CFR § 64.6301, the company has performed the following Robocall Mitigation procedures:

STIR/SHAKEN:

- ☐ The company's network will be able to pass STIR/SHAKEN tokens as they come. The company will not be modifying or changing the level of certification received.
- ☐ The company has the ability to block calls that are either not signed with STIR/SHAKEN or that have an incorrect certificate.
- ☐ The company is actively blocking unsigned calls from upstream carriers it deems should have been able to or that were obligated to sign.

ROBOCALLING:

- ☐ The company has implemented several network wide restrictions meant to curb any potential short duration traffic such as:
 - We have a network wide ANI Blacklist. All calls from these ANI's are blocked.
 - If a trunk receives more than 100 calls from the same ANI we will evaluate the ASR, ACD, and Short Duration Percentage (SDP). If any of these parameters are below the set thresholds, the ANI will be blocked in the switch for a period of twenty-four hours.
 - If a call comes from a "Neighboring" number, meaning the NPA-NXX is the same on both the ANI and DNIS, such call will be blocked.
- ☐ If the company finds that there is suspicious traffic that has a mix of short duration and long duration calls, we will increase the level of scrutiny of the calls by implementing additional steps:



- Blocking of any call in the DNC list
 - Blocking of any call with a U.S. Wireless ANI
 - Blocking of any call to a US Wireless DNIS
 - Blocking of inbound Media IPs that are well known to produce fraud calls
 - Blocking based on SOMOS DNO lists
- YouMail: The company is subscribed to YouMail. YouMail provides a realtime database that scores the probability of an ANI producing SPAM, Fraud, or calls violating TCPA regulations. We find that approximately 15%-20% of calls we receive are blocked by this system.

Know Your Customer (KYC):

- The Company provides service to carrier customers and requires potential customers to complete a comprehensive Profile which includes their legal information, filer and exemption information, industry and financial references, as well as other pertinent data to verify that the carrier is a registered Intermediate Provider and in good standing and certified to provide telecommunication services.
- If the company finds that the client is violating the restrictions above and the customer fails to remediate and detail the case of said irregularities, the company will take action such as suspension or termination of interconnection.

ITG:

- In addition, Red Telecom will comply with TOP priority any traceback response required by US Telecom Industry Group (ITG) in the shortest possible time frame. We will also communicate to the client about the traceback, and we will implement a probatory period where no more tracebacks will be allowed.

Red Telecom's Role in the call chain:

- Red Telecom is an intermediate provider. We receive calls from either gateway providers or other intermediate providers. We send calls to other intermediate providers.



- ☐ Red Telecom does not originate or has no agreements with carriers that require calls to be signed by the company as we do not sell DIDs, we do not have clients that originate their own calls (we do not act as a gateway).

RMD Filing:

- ☐ Red Telecom is not prohibited to file in the RMD.

FCC investigations:

- ☐ Red Telecom is not and has not been part of any formal FCC, law enforcement, or regulatory agency action or investigation within the last two years due to suspected unlawful robocalling or spoofing.