



ROBOCALL MITIGATION PLAN

January 24, 2025

OVERVIEW

Rayfield Communications (Rayfield) is a small family-owned business providing Interconnected Voice over Internet Protocol (VoIP) and data communications services. Rayfield provides non-facilities-based (Over-the-Top - OTT) VoIP service to end users (service not to be resold by its customers). Rayfield has fewer than 100,000 voice subscriber lines and resells VoIP service obtained through an upstream provider, Sangoma U.S., Inc. (Sangoma).

STIR/SHAKEN and OCN

Rayfield is fully compliant with the FCC's STIR/SHAKEN requirements for Interconnected VoIP service providers. While Rayfield is not a facilities-based service provider, it does use proxy servers which allow the implementation of the STIR/SHAKEN system/services with technical STIR/SHAKEN services provided by Sansay. Signing of outbound calls from Rayfield is done using its own security certificate, purchased and owned by Rayfield, obtained from Sansay (an STI-PA approved Certification Authority).

Rayfield does have an Operating Company Number (OCN), which is: 006K.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

Rayfield follows the North American Numbering Council (NANC) - *Call Authentication Trust Anchor Working Group* guidelines and best practices for vetting caller identity ([2020-07585.pdf](#) ([govinfo.gov](#))).

This includes confirming the identity of all its customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of its customers' businesses.

New customers are required to sign a Terms of Service Agreement that expressly prohibits customers/subscribers from engaging in illegal activity, including creating a false Caller ID (*i.e.* spoofing) and robocalling. Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be immediately terminated.

II. KNOW YOUR UPSTREAM PROVIDER

Rayfield only uses one upstream provider, Sangoma, originally known as VoIP Innovations and has done so since Rayfield started its VoIP services. Sangoma is a leading wholesale VoIP service provider and has an outstanding reputation in the VoIP service industry. Sangoma can also provide technical services for STIR/SHAKEN, although as mentioned above, Rayfield uses the technical services for STIR/SHAKEN from Sansay.

III. TRACEBACK

Rayfield will respond to all traceback requests from the Federal Communications Commission (FCC), law enforcement, and the Registered Traceback Consortium within 24 hours (or less) of such requests.

In the event illegal robocallers use its system, Rayfield will gladly cooperate with the FCC, any law enforcement agency and the Registered Traceback Consortium in the investigations of any such illegal activity.

Traceback requests should be directed to:

John Rayfield, Jr. or John Rayfield, Sr
2748 S Austin Ave
Springfield, MO 65807
417-887-4663 (office)
417-818-3443 (cell) or 417-818-3442 (cell)
johnjr@rayfield.net or johnsr@rayfield.net

IV. ROBOCALL MITIGATION PLAN

Rayfield has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

Telephone Number Assignment

Customers are assigned valid 10 digit telephone numbers which are obtained through its upstream service provider. Only telephone numbers which are available through its upstream provider (either new numbers or ported numbers) are allowed to be used by Rayfield's customers, with extremely limited exceptions. (see Additional Monitoring and 'Rules' below)

Analytics / System Monitoring

Rayfield currently utilizes numerous system monitoring tools to mitigate robocalls. This includes call record analytics which provide daily and weekly reports to inform it of "short-duration" calls and other unusual spikes in calling or traffic patterns consistent with illegal robocall activity. Rayfield uses analytic software tools provided by a third party (Rayfield's upstream service provider) as well as analytic software tools developed by Rayfield.

Some of the analytic tools used are provided by Rayfield's upstream service provider (Sangoma), such as the tools used to monitor "short-duration" calls and unusual 'spikes' in outbound call

activity of end users. Rayfield also uses software that has been developed by Rayfield, such as software that shows outbound call usage for each end user (number of calls and time usage of those calls), using Call Detail Record data provided by the upstream provider (Sangoma). Such usage data will also help to show spikes or sudden excessive usage data that could indicate robocall activity.

Sangoma is the sole third party that works with Rayfield in the deployment of the analytics described above. Sangoma's robocall contact information is as follows:

Sangoma U.S., Inc.
301 N. Cattlemen Road
Ste. 300
Sarasota, FL 34232
Bruce Illes
General Counsel
(941) 960-8284
legal@sangoma.com

Additional Monitoring and 'Rules' to Prevent Illegal Activities

Rayfield has developed a feature in its proxy server systems that checks the calling party number (a/k/a ANI) to confirm that the Outbound Caller ID is a valid 10-digit telephone number that is associated with the subscriber. If the 10 digit Outbound Caller ID that a customer attempts to use for an outbound call is not properly registered through Rayfield and/or Sangoma for that customer, that outbound call will be blocked. This will provide another level of checking to make sure its customers are not using illegally spoofed numbers. Exceptions can be made to this, if a customer has a legitimate reason not to use a valid 10 digit registered telephone number for Outbound Caller ID or to use another 10 digit telephone number that Rayfield has confirmed is registered with another legitimate service provider. Such exceptions are handled on an individual case-by-case basis and are not 'automatically' allowed. Also, Outbound Caller ID Names can only be used that match the customer's name, company name, dba name or something similarly related to the customer or his/her business.

V. PLAN UPDATES

Rayfield will continue to monitor industry best practices and improve our internal processes to ensure its systems adapt to address the ongoing challenges affecting this industry. Updates to this Robocall Mitigation Plan will be provided to the FCC as such updates to its internal processes occur.