

Robocall Mitigation

800 Response Information Services LLC

Introduction

800 Response Information Services LLC ("800RIS") furnishes this attachment to its Robocall Mitigation Database registration to provide background and documentation for its robocall mitigation procedures, per the requirements of 47 CFR Part 64 Subpart HH.

800RIS is a non-facilities-based voice service provider and SMS/800 Resp Org providing "Called Party Pays" voice services on Toll-free and Direct Inward Dial (DID) telephone numbers in the US and Canada. With no originating or termination access facilities, and no direct access to telephone numbers, 800RIS has established business relationships with several flagship nationwide carriers to originate our inbound traffic on their own networks and deliver them to our platform. Similarly, we use several long-distance carriers to terminate our outbound traffic.

All inbound calls are answered, with the exception of those that are blocked as described below. We then apply a variety of techniques within our platform to derive the appropriate customer and destination number. We then originate a new call with the original Calling Party Number (CPN) to that destination number via one of our long-distance carriers and bridge the two call legs.

Thus, calls placed to a number that we serve are in effect "redirected" from the subscribers of originating service providers to the subscribers of terminating service providers; the latter represent our customers.

800RIS knows our upstream service providers well: each is a flagship nationwide telecommunication company, and all have served us and the public for many years.

800RIS's customers use our service not to originate but to receive calls and we have become well acquainted with each customer through ongoing customer service and marketing communications, and through our normal on-boarding process, including working closely to build the appropriate routing and Integrated Voice Response (IVR) treatment(s) for their inbound traffic, and arranging billing and collections details.

Mitigation

All calls that we originate on our network are subject to robocall mitigation per § 64.6305. No prior certification has been removed by the Commission, and we have not been prohibited from filing in the Robocall Mitigation Database.

As the problem of robocalls has escalated steadily over the past decade, 800RIS has developed and deployed the following mitigation tactics in response to customer demands. In addition, we have deployed Ribbon Communications Identity Hub Services (IDH) to perform data analytics. Taken together, these mitigation tactics supplement the STIR/SHAKEN implementations and tactics of the voice service providers who originate and terminate traffic on our numbers:

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- Placing in the Somos RealNumber “Do Not Originate” database numbers that should only be used for Inbound Calling
- Blocking nuisance or fraudulent calls flagged by Ribbon’s IDH Services including but not limited to its “Do Not Originate” databases
- Blocking calls with an international CPN or a US CPN with an invalid area code / exchange
- Monitoring traffic in real-time for excessive short duration calls; such alerts are used to identify and alleviate the problem
- At the request of the customer, blocking specific CPNs
- At the request of the customer, adding to the call flow an initial prompt requiring the caller to press a key in order to continue routing a call
- Responding to carriers’ notifications of suspicious calling patterns
- Monitoring residual traffic on toll-free numbers that have been newly assigned to customers, to ensure minimal use, i.e., no, or low call volume from previous subscriber(s)

Those same competitive pressures ensure that 800RIS will continue to expand its robocall mitigation efforts, including but not limited to extending our fixed defenses, enhancing our IVR application design, and improving monitoring techniques used to proactively detect an up-tick in robocalls.

Traceback

800RIS will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls, notwithstanding the fact that we have no business relationships with the parties who originate calls to our customers.

Our Robocall Mitigation Database filing contains the required contact information for a single employee who is responsible for ensuring that trackback requests are timely fielded, verified and responded to.

Full STIR/SHAKEN Implementation

In compliance with § 64.6301(a)(1) and (2), we have fully implemented the STIR/SHAKEN authentication framework across our entire network, using our own Secure Telephony Identity certificate. In compliance with § 64.6301(b), a third party hosts our certificate and verifies and authenticates our calls using attestation levels specified by 800RIS.

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Previous Action

Neither 800RIS nor any entity under common ownership has ever been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation.