

RCLEC, Inc.

Robocall Mitigation Plan

RCLEC, Inc. ("RCLEC") is committed to minimizing the number of robocalls that originate on its network and preventing unwanted robocalls from reaching end users. To this end, RCLEC has implemented this Robocall Mitigation Plan ("the Plan").

Know Your Customer Procedures.

RCLEC provides services on a wholesale basis only and verifies the identity of its customers. RCLEC requires all resellers to implement reasonable know your customer procedures and to confirm their customers' right to use telephone number resources.

Know Your Upstream Provider Procedures

RCLEC contracts with a small number of respected upstream providers. Both RCLEC and the providers are contractually obligated to offer service in compliance with all applicable laws and regulations, including but not limited to the laws and regulations related to robocalling.

RCLEC only accepts traffic from immediate upstream providers that are listed in the Robocall Mitigation Database and does not knowingly accept traffic from providers who are not listed in the Robocall Mitigation Database.

Customer Compliance with Robocalling Rules and Existing Law.

RCLEC requires end customers to use RCLEC services in compliance with the law and prohibits, among other things, illegal call spoofing, fraud, and use of automatic or predictive dialing without the called party's prior consent.

Active Monitoring of Network for Fraud

RCLEC monitors its network for suspicious calling patterns; promptly investigates any alerts related to illegal, abusive, or otherwise unacceptable behavior; and applies consistent processes and standards to any allegations of service abuse and acts fairly and transparently toward our customers. After investigation, RCLEC makes a determination of the appropriate action, which may include denial of service, suspension of service, termination of service, and no action. RCLEC is able to immediately impose its action upon customers without any delay.

Full and Timely Compliance with Traceback Requests

RCLEC responds to traceback requests within 24 hours of receiving the request, as required by the Federal Communications Commission rules. RCLEC requires all resellers and upstream providers to comply with all traceback efforts, whether initiated by the Federal Communications Commission, the designated Industry Traceback Group, law enforcement, or by any other applicable voice service provider or interested party.

When a traceback request is made or any other credible complaint brought to its attention, RCLEC promptly investigates the suspect traffic to determine the call path(s) and whether the traffic is likely to be illegal robocalling. If the traffic is deemed highly likely to be illegal, RCLEC takes appropriate steps to ensure that the suspicious traffic does not continue, including terminating the caller's access to RCLEC's network.

STIR/SHAKEN Implementation.

RCLEC has implemented STIR/SHAKEN on its IP-networks. Should RCLEC sign calls, it will sign the calls in accordance with relevant ATIS standards.

Affiliates

RCLEC is wholly owned by voice service provider RingCentral, Inc. ("RingCentral"). RingCentral is a publicly traded corporation. Both Vlad Shumnis and Vlad Vendrow own more than 10% of RingCentral stock. In addition, Mr. Shumnis is RingCentral's Chief Executive Officer and manages and controls RingCentral's businesses.

RingCentral also wholly owns voice service providers Connect First, Inc. and RingCentral MiCloud & Sky, LLC. RingCentral, Connect First, and RingCentral MiCloud & Sky are listed in the Robocall Mitigation Database and have published a Robocall Mitigation Plan.

Neither RingCentral, RCLEC, Connect First, RingCentral MiCloud & Sky, Mr. Vendrow, nor Mr. Shumnis have been subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.