

Business Information

Red Gap Communications, Inc.
2106 N Main Street
Fort Worth, Texas 76164

Contact Information

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Overview

In the Commission's release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider" procedures;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Red Gap Communications, Inc. ("Red Gap") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. Red Gap is fully STIR/SHAKEN compliant. This document delineates Red Gap's RMP. As shown herein, Red Gap diligently performs robocall mitigation in compliance with the Commission's rules.

Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Red Gap in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Red Gap's KYC program involves obtaining specific information when a subscriber signs up for service. This process includes collecting such information such as:

- name;
- phone number;
- physical business location;
- contact person(s);
- nature of the customer's business.

Moreover, Red Gap requires a meeting with the client, and a signed master service agreement ("MSA") before providing service for a customer. Red Gap does not allow outbound calls with CID numbers not in our system.

Acceptable Use Policy ("AUP")

Red Gap's MSA prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Red Gap's service to engage in or in connection with fraudulent activities.

Red Gap's contractual terms with subscribers state that Red Gap may suspend or terminate service for violation of the AUP provisions in the MSA.

Know Your Upstream Provider

In accordance with the Commission's directive in Advanced Methods to Target and Eliminate

Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third

Notice of Inquiry in CG Docket 17-59 (Rel. May 19, 2023) ¶¶ 49-51, below is the name and contact information regarding our upstream provider.

Bandwidth Inc.
2230 Bandmate Way
Raleigh NC 27607
Stephen Thayer
(919) 704-3069
voicesecurity@bandwidth.com

Analytics for Monitoring Traffic

Red Gap, both internally and with its upstream provider, works to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- high volumes of short calls;
- high volumes of repetitive calls;
- elevated volumes of errors or calls to invalid numbers;
- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

The third-party vendors are involved in deploying Red Gap's analytics are Bandwidth Inc. and Ribbon Communications (f/k/a Sonus Networks).

Investigate Suspicious Activity

When traffic analysis indicates the presence of potential illegal robocalling, Red Gap works internally and with its upstream provider to follow defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Red Gap follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Red Gap will devote sufficient resources to provide prompt and complete resources to traceback requests.

Red Gap certifies that it will respond to all traceback requests within 24 hours of receiving same.

Red Gap investigates suspicious activity found by its monitoring system and/or reported by subscribers or third parties, including ITG, the Commission, the Anti-Robocall Multistate Litigation Task Force, and law enforcement. The investigation could potentially result in opening a traceback request or with Red Gap contacting a subscriber to correct improper use of the applicable platform, or if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated contracts governing the transport of voice calls, Red Gap will endeavor to contractually require our subscribers to cooperate in traceback investigations by, among other things, identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

Red Gap will implement Do Not Originate requests it receives from ITG and other pertinent entities. Red Gap has mechanisms to automatically block suspicious calls using internal analytics. If Red Gap identifies suspicious robocalling patterns that are confirmed with further investigation, Red Gap will take appropriate action which may include suspending or terminating the subscriber's use of Red Gap's service. Red Gap will cooperate with Investigative Bodies provide a single point of contact to address traceback requests from law enforcement, the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Red Gap will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

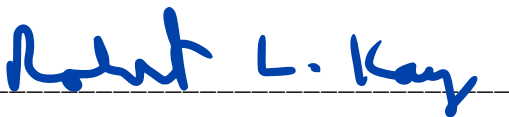
In the event of any material change to this plan, Red Gap will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Robert L. Kay

I, Robert L. Kay, Vice President of Red Gap Communications, Inc. ("Red Gap"), do hereby certify, under penalty of perjury, the following:

1. Red Gap has implemented STIR/SHAKEN in the IP portions of our network.
2. Red Gap's business name and primary address are as follows:

Red Gap Communications, Inc.
2106 N Main Street
Fort Worth, Texas 76164
3. Red Gap has no other business names in use.
4. Red Gap has not previously used any other business name. Red Gap has no parent company, affiliates or subsidiaries. The individuals with 10% or more ownership in Red Gap are: Michael Tedder, Erik Smatresk, and Robert Kay.
5. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
6. Red Gap's role in the call chain is that of a voice service provider with a STIR/SHAKEN obligation.
7. Red Gap has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
8. Red Gap is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
9. Red Gap's Operator Company Number is 229L.



Robert L. Kay