

Robocall Mitigation Plan

rNetworks is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

rNetworks purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290) who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to rNetworks.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). rNetworks is primarily an Internet service provider. rNetworks vet customers primarily by collecting billing and physical address information. If an end user wishes to use an existing TN as a caller identity, rNetworks requires a valid letter of authorization that the end user is the authorized user of such TNs. If customer does not have an existing TN, one will be assigned based on information collected by rNetworks to a TN.

International Subscribers

rNetworks does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

rNetworks maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use rNetworks's broadband or voice services. Among other things, this AUP states:

"You may not use your account to:

- Engage in any activity that interferes with other's use and enjoyment of the Internet
- Engage in any activity that violates State or Federal law
- Violate the network policies of any network accessed through your **rNetworks** account
- Engage in newsgroup spamming, mass junk (Spam) e-mailing or mail "bombing"
- Engage in the transmission of pirated software
- Conduct or participate in illegal gaming
- Solicit for illegal pyramid schemes through news groups or mass e-mail"

Traceback Requests

rNetworks is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the industry traceback consortium. Furthermore, rNetworks is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use rNetworks service to originate calls. Subscribers are required to comply with

traceback requests via our AUP. Traceback requests can be sent to info@rNetworks.net for immediate processing by rNetworks.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by rNetworks or our wholesale partner Atheral LLC, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to rNetworks of authorization to use a TN, documentation will be provided to Atheral LLC so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, Atheral LLC uses TransNexus's ClearIP solution to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Atheral will immediately ask rNetworks to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If rNetworks or Atheral LLC determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Atheral LLC has fully implemented STIR/SHAKEN as of June 30th, 2022.