

RDI Corporation – CityVoIP Robocall Mitigation Plan

Corporate Overview

RDI Corporation -- CityVoIP (hereafter referred to as *RDI CityVoIP*) is a regional VoIP service provider with fewer than 100,000 end-users. *RDI CityVoIP* is a subsidiary of RDI Corporation (RDI is based in Cincinnati, OH) . *RDI CityVoIP* is an entirely independent subsidiary serving its own pool of customers, and is entirely independent of the parent corporation's other businesses.

RDI CityVoIP is committed to actively eliminating the ability of our customers to participate in any form of Robocalling activity or other illegal actions using our services.

Our Role In The Call Chain

RDI CityVoIP is a regional VoIP provider. We utilize VoIP Innovations for upstream telephony services and rely on their Robocall Mitigation strategies - including STIR/SHAKEN and activity monitoring, to protect our customers from Robocalls (see end of this document for further details).

For calls originating from our own customers, we utilize a know-your-customer approach coupled with active monitoring and analytics to ensure legal and robocall-free activity on our networks. These strategies and plans are described in the next sections.

Customer Vetting Practices and Restrictions against Robocalling

We employ both a know your customer approach and active monitoring and analytics to ensure that Robocalling is not an activity that any of our clients engage in. Below, we describe our customer relationship and restrictions against robocalling

RDI CityVoIP follows 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>)

RDI CityVoIP carefully screens new customers to ensure that they are engaged in legitimate business practices and are not engaged in Robocalling activities. We reserve the right to terminate our customers service at any time – and we are committed to terminating the phone services for any customers who prove to be engaging in harmful or illegal activities such as Robocalling or phone scams.

For each of our customers, we ensure we have the following information for any site that is using our phone services:

- Customer/Business Name
- The Physical address of the site.
- The Primary IP Address of the site
- A customer contact to reach out to for each site.
- We obtain appropriate E911 information for each customer in compliance with FCC regulations. This includes a contact and physical address for each site.

Monitoring and Analytics

RDI CityVoIP actively monitors and analyzes the activity of our customers and specifically blocks any customer that is detected to be mis-using the service. We have automated alerts that allow us to investigate any detected fraudulent or suspicious activities. We monitor for a number of things, including but not limited to:

- Excessive Call Volume
- Misuse of 911 services
- Dialing restricted area codes (prohibited)
- Mis-use of caller ID

We have automatic cut-offs to ensure customers cannot flood the network with outgoing calls. We maintain CDRs records for all calls on our network, as well as phone server logs and other tools that allow us to ensure quality and control for our services.

Traceback & Compliance with Government Agencies

When issues are detected, we have staff available on-call 24 hours a day to ensure that urgent requests and issues can be addressed. We are committed to cooperating with local and federal agencies to ensure that any complaints related to our customers are handled effectively and lawfully.

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. We are committed to doing so with 24 hours whenever possible.

Official Actions or Investigations Due to Unlawful Robocalling or Spoofing

We are not currently under any official action or investigation due to suspected unlawful robocalling or spoofing.

Previous STIR/SHAKEN Extensions

We were eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

All our outbound voice traffic currently uses **VoIP Innovations**, which has fully implemented STIR/SHAKEN on their network and provides a Robocall Mitigation solution to their clients. Their features are described below:

Supporting the TRACED Act, VoIP Innovations delivers a simple to integrate robocall mitigation solution to protect your subscribers on inbound phone calls. Combining behavioral analytics, caller authentication and verification, our solution features:

- **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls
- **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent