

Robocall Traffic Mitigation Practices STIR/SHAKEN Implementation

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Document Revision History

<u>Version</u>	<u>Reason for Change</u>
1.0	Document initially created in a collaborative online workspace for team/group additions
1.1	Signage, logo, and cosmetic updates to document format
2.0	Final checked version for upload to FCC RMD, 09/13/21
2.1	Relocation update, copyright update, change of STIR/SHAKEN certification and implementation
2.2	Overview of document, update years, review practices and confirm in place
2.3	Review of traceback practices and updating of contact information and procedures

About Rival5

Rival5 Technologies Corporation "Rival5" is a Mokena, Illinois based company that specializes in Managed Cloud Communications solutions. Since founding in 2011, we have partnered with a variety of businesses, healthcare facilities, educational institutions, and other entities to change the way they communicate.

Our turnkey approach relieves the stress that comes with managing complex telecommunication solutions -- allowing organizations to focus on what they do **best**.

About the TRACED Act

(Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act)

Fighting illegal robocalls is a top consumer protection priority for the Federal Communications Commission (FCC), and call authentication is an integral part of solving this critical challenge. With the recent passage of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, Congress expressed its support for a robust call authentication system.¹

As part of the TRACED Act, Congress directed the Commission to "issue best practices that providers of voice service may use as part of the implementation of effective call authentication frameworks...to take steps to ensure the calling party is accurately identified."²

About STIR/SHAKEN

STIR/SHAKEN is a framework of interconnected standards. STIR/SHAKEN are acronyms for the Secure Telephone Identity Revisited (STIR) and Signature-based Handling of Asserted Information Using toKENs (SHAKEN) standards. This means that calls traveling through interconnected phone networks would have their caller ID "signed" as legitimate by originating carriers and validated by other carriers before reaching consumers. STIR/SHAKEN digitally validates the handoff of phone calls passing through the complex web of networks, allowing the phone company of the consumer receiving the call to verify that a call is in fact from the number displayed on Caller ID.³

¹ Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, S. 151, 116th Cong., at § 4(b)(1) (2019) (TRACED Act).

² TRACED Act § 4(b)(7).

³ STIR/SHAKEN CALLER ID AUTHENTICATION GOVERNANCE FRAMEWORK
<https://docs.fcc.gov/public/attachments/DA-20-1374A1.pdf>

Rival5 Technologies Corporation “Rival5” is dedicated to helping curb the number of illegal robocalls and traffic traversing the public switched telephone network on a daily basis. The FCC requires that all voice service providers certify in the Robocall Mitigation Database that they in some way implement STIR/SHAKEN technologies within their network, or separately subject calls to a Robocall Mitigation Plan (RMP) to ensure that no originating calls are of an illegal nature.

STIR/SHAKEN Implementation

Rival5 currently utilizes carrier-level attestation of calls based on number and lease ownership within our carrier umbrella and their internal caller-ID authentication and signature signing. All calls originating outside of Rival5 networks as part of our RVoice VoIP-based public-switched telephone network accessible phone services are signed at the carrier-level and are compliant.

Rival5 has implemented its own internal signing outgoing calls using STIR/SHAKEN authentication frameworks across its network using certificate delegation for better authentication of off-net originating calls to better enhance our service. This posting is updated accordingly as development advances. Rival5 will continue monitoring and observing its voice traffic that originates on its network, as subject to the robocall mitigation program described below.

Rival5 Robocall Mitigation Program

Internal Customer Vetting / Verification

Rival5 customer activation is only performed after a sales process where a Rival5 MSA (Main Service Agreement) is completed and agreed to. Rival5 selectively chooses to do business with subscribers only after it is determined that it will be a benefit to both parties for service to be provided and so after Rival5 determines that the organization is one of good legal standing and business model.

Rival5 continues after the initial customer activation to check-in and communicate with customers through the use of email marketing, service tickets or requests, phone calls, virtual meetings, and more throughout the service agreement and time after that as an active customer, as well as continuing with the monitoring of traffic as further outlined.

Retail / Small Business / Individual Organization Customers

Rival5 customers are all end-users for Rival5 directly. Rival5 does not provide services to wholesalers or reseller companies that directly receive the service to their infrastructure. Rival5 has reseller and referral partners that simply refer end-users to Rival5 for direct billing/subscription. At no time do any reseller/referral partners of Rival5 have direct access to infrastructure to resell services.

International Subscribers

Rival5 does not sell origination or termination services to any subscribers outside of the US.

Telephone Number Validation

Rival5 verifies that subscribers only broadcast telephone numbers that they are allowed to use. Rival5 owns its customers' telephone numbers, through the use of multiple national-level carriers, and can attest to the use of their numbers on a call-by-call basis. Any numbers outside of the customer's footprint will have to submit a legitimate use-case of the number, and potentially a letter of authorization (LOA) from the party owning the number, in order for Rival5 to attest/allow the TN or ANI to be presented on outgoing (originating) calls.

Traffic Monitoring & Alerting

Rival5, through the use of its own software, maintains a database of targeted higher-than-expected cost of rate centers which are by default blocked to subscribers. Rival5 and its wholesale carrier partners also monitor traffic patterns, including traffic sending to specific geographic locations, telephone numbers within certain timeframes, as well as volume differences of inbound vs. outbound traffic. Any abnormalities of usual traffic patterns are brought to the attention of Rival5 support engineers and other teams for an investigation to determine the legitimacy of traffic and to make contact with end-users if required.

Traceback Requests / Robocall Lookups

Rival5 is committed to responding in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, its wholesale carriers, and the industry traceback consortium. Any wholesale carrier requesting a traceback must have an active service agreement and relationship with Rival5 for any release of information. Rival5 will authenticate any traceback requests.

Furthermore, Rival5 is committed to cooperating with such entities to investigate and stop any illegal robocalling or other fraudulent uses of Rival5 services and infrastructure to originate calls. Traceback requests can be requested to Rival5 by filling out the web form located at rival5.com/traceback. Submissions will open a service request ticket within Rival5 support systems and are subject to internal service level agreement prioritization. Please do not utilize an email for submission that is attached to any auto-replying service or software.

Right to Terminate Service

Should a customer repeatedly be observed as attempting to illegally commit fraud, robocall, or otherwise undesirable traffic across our network, Rival5 maintains the right to terminate service to a customer as outlined in the customer's Main Service Agreement with Rival5.

As of 04/01/2024: The FCC RMD contact is being updated to:

"FCC Compliance", email address: fcc-compliance@rival5.com, away from traceback emails that were listed on the public RMD database and were subject to incessant spam and solicitation emails.