

# Red Barn Technology Group

**FCC Registration Number (FRN):** 0031387095

**Date:** April 14, 2026 (updated)

## ROBOCALL MITIGATION PLAN (RMP)

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### 1. Company Overview and Prior FCC Action

#### 1.1 Company Overview

Red Barn Technology Group is a non-facilities-based voice service provider that offers VoIP-based business telephone services to enterprise and small-business customers in the United States. We provide service using:

- **Customer-premises IP PBXs**, including **3CX-based systems** deployed, managed, and supported by Red Barn Technology Group; and
- **Upstream SIP carriers** (currently **Flowroute** and **VoIP Innovations**, collectively the “**Upstream Carriers**”) for **PSTN origination and termination**.

Red Barn Technology Group does not operate its own last-mile physical network and does not directly hold numbering resources from numbering administrators. Telephone numbers and PSTN connectivity are provisioned through the Upstream Carriers under Red Barn Technology Group-managed carrier accounts.

#### **Reseller / service delivery model (clarification)**

Red Barn Technology Group resells **3CX licensing** and provides **managed hosted PBX services**. Each customer's 3CX system is hosted as a **customer-dedicated cloud instance** (e.g., a DigitalOcean droplet) and communicates **directly** with the Upstream Carriers for PSTN origination/termination. Red Barn Technology Group pays the Flowroute and VoIP Innovations carrier bills under our wholesale accounts and resells these services to our customers. Red Barn Technology Group does not operate the carrier network infrastructure where STIR/SHAKEN authentication/signing is implemented on the public network.

Red Barn Technology Group is committed to preventing the origination of illegal robocall traffic over its network and to full cooperation with the FCC, law-enforcement agencies, and the Industry Traceback Group (ITG).

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#### 1.2 Prior FCC Enforcement / Regulatory Action (RMD)

Red Barn Technology Group has been the subject of an FCC Enforcement Bureau matter related to the Robocall Mitigation Database (RMD):

**Removal Order:** On August 25, 2025, in DA 25-737, the Enforcement Bureau removed the Company's certification from the RMD after finding that:

- The Company had not submitted an updated RMD certification and robocall mitigation plan containing all information required; and
- The Company did not cure those deficiencies by the deadlines set.

**Effect of Removal:** The Order required all intermediate providers and voice service providers to cease accepting traffic directly from the Company, and required Commission consent before the Company could refile in the RMD.

**Explanation of prior non-response / missed updates:**

We did not respond to the FCC notices at the time because we experienced personnel turnover and a breakdown in internal ownership of the Robocall Mitigation Database (RMD) compliance process. The employee who had been responsible for the RMD filing departed without updating the FCC point-of-contact information in our filing or ensuring that FCC correspondence to that address was forwarded to another monitored mailbox. Consequently, notices sent to the contact email address listed in the RMD filing were not received or escalated to management for action. This contributed to our failure to update our RMD filing with newly required information by the February 26, 2024 deadline. We have since updated our filing, reassigned clear internal ownership of RMD compliance, and implemented procedures to ensure the RMD point-of-contact information remains current and that FCC notices are monitored and acted upon promptly in the future.

Following that removal, Red Barn Technology Group submitted an updated certification and an enhanced robocall mitigation plan, and on August 29, 2025 received notice that its RMD filing was provisionally reinstated pending further refinements requested by Bureau staff. The present Plan and associated certification are designed to fully address the remaining deficiencies identified by the Enforcement Bureau.

**Current deficiencies being addressed in this revision (as requested by FCC staff)**

This revision is intended to address the following items:

1. **Action / investigation disclosure detail** — expand and ensure the portal “action/investigation” field contains the required multi-part description.
  2. **KYC detail** — ensure KYC is sufficiently detailed, including whether third-party analytics is used (and identify the vendor if so), and clearly describe how KYC is applied to existing customers.
  3. **Plan scope applies to ALL traffic** — confirm mitigation steps cover all traffic, not only non-STIR/SHAKEN.
  4. **STIR/SHAKEN certification deficiency (latest notice)** — cure the issue that the Company certified to no STIR/SHAKEN attestation/implementation but did not identify a valid extension/exemption or rule-based basis. This Plan addresses that by adding a STIR/SHAKEN certification status and basis section (Section 3.0) documenting the Company's lack-of-control basis and providing matching portal narrative.
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## 2. Scope of Robocall Mitigation Program

This Robocall Mitigation Plan (“Plan”) describes the measures Red Barn Technology Group takes to:

- Prevent the origination of illegal robocalls, including high-volume and/or unsolicited robocalling, from customers on our platform;
- Ensure appropriate management of caller ID information, including protection against spoofed, invalid, or unauthorized caller ID;
- Apply Do-Not-Originate (DNO) and inbound-only number controls, in coordination with the DNO enforcement performed by the Upstream Carriers;
- Monitor traffic and use analytics to identify and remediate suspected illegal or abusive calling; and
- Cooperate fully with traceback requests and regulatory investigations.

### **Scope Clarification (per 47 C.F.R. § 64.6305):**

Unless expressly noted otherwise, all measures in this Plan apply to every call that Red Barn Technology Group originates or carries over its 3CX-based platforms and associated SIP trunks, regardless of whether the call is signed with STIR/SHAKEN by an Upstream Carrier or is non-STIR/SHAKEN traffic.

This Plan therefore covers all domestic and international voice traffic that Red Barn Technology Group originates or passes to the PSTN through its Upstream Carriers.

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## 3. STIR/SHAKEN, DNO, and Upstream Carrier Controls

### 3.0 STIR/SHAKEN Certification Status (RMD) and Basis (added to cure latest deficiency)

#### **RMD Certification Position:**

Red Barn Technology Group's RMD filing certifies to “**No STIR/SHAKEN Implementation**” by Red Barn Technology Group.

#### **Rule-based basis and detailed explanation:**

**Pursuant to 47 C.F.R. § 64.6305(d)(2)(i)**, Red Barn Technology Group is unable to implement STIR/SHAKEN due to a **lack of control over the network infrastructure necessary to implement STIR/SHAKEN**. Specifically:

- Red Barn Technology Group is non-facilities-based and does not operate carrier network infrastructure for public network call origination.
- Each customer's 3CX system is hosted as a customer-dedicated cloud instance and communicates directly with the Upstream Carriers (Flowroute and VoIP Innovations) for PSTN connectivity.
- The Upstream Carriers control the network-level call authentication/signing functions on the call path and apply STIR/SHAKEN consistent with applicable Commission rules.

Accordingly, Red Barn Technology Group does not implement STIR/SHAKEN itself and relies on the Upstream Carriers' network infrastructure for STIR/SHAKEN signing/verification and related robocall controls.

#### **Added to RMD Portal:**

The Company is a domestic non-facilities-based reseller and is not claiming foreign-provider status. **Pursuant to 47 C.F.R. § 64.6305(d)(2)(i)**, the Company is unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN. Customer 3CX systems are hosted as customer-dedicated cloud instances and communicate directly with the Company's Upstream Carriers (Flowroute and

VoIP Innovations) for PSTN connectivity, and the Company does not operate the carrier network infrastructure where STIR/SHAKEN authentication/signing is implemented on the public network.

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### **3.1 Upstream Carrier Controls (STIR/SHAKEN, DNO, analytics)**

Red Barn Technology Group relies on Flowroute and VoIP Innovations as its primary Upstream Carriers for PSTN interconnection. Each Upstream Carrier:

- Implements STIR/SHAKEN for signing and/or verifying calls that traverse its networks, consistent with applicable Commission rules;
- Applies robocall analytics, reputation checks, and DNO / invalid-number blocking; and
- Maintains lists and blocking policies covering:
  - Invalid or improperly formatted numbers;
  - Unallocated or unused numbers; and
  - Numbers designated as Do-Not-Originate (including certain government, financial, and enterprise inbound-only numbers).

All outbound PSTN calls from Red Barn Technology Group's 3CX systems are delivered to the Upstream Carriers over SIP trunks that preserve the true calling party number (via From and/or P-Asserted-Identity headers). This allows the Upstream Carriers' STIR/SHAKEN and DNO controls to operate on the actual originating caller ID.

#### **Knowing Our Upstream Providers**

Red Barn Technology Group maintains procedures to "know its upstream providers," including:

- Confirming that each Upstream Carrier maintains a compliant RMD filing and STIR/SHAKEN implementation
  - Reviewing public documentation, customer notices, and legal updates from the Upstream Carriers regarding:
    - STIR/SHAKEN signing and verification practices;
    - DNO lists and invalid-number blocking; and
    - Robocall mitigation and traceback policies; and
  - Periodically re-evaluating the suitability of each Upstream Carrier in light of FCC enforcement actions or industry tracebacks.
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## 4. Caller ID Management and Internal DNO / Inbound-Only Controls

### 4.1 Centralized Caller ID Control in 3CX

Within our 3CX-based PBX environment, Red Barn Technology Group centrally controls outbound caller ID:

- Each extension, trunk, and outbound route is configured with a validated telephone number that Red Barn Technology Group either owns or is authorized to use for that customer.
- Endpoint devices (desk phones, softphones, ATAs, etc.) are not permitted to arbitrarily set caller ID in SIP signaling. 3CX overwrites device-provided caller ID with the configured Outbound Caller ID or trunk-level CLI before any call is sent to an Upstream Carrier.
- Caller ID values are normalized to valid NANP/E.164 format (e.g., +1NXXNXXXXXX for U.S. numbers) using 3CX caller ID reformatting rules.

This configuration prevents customers from using unauthorized or obviously invalid caller ID values, such as:

- Non-numeric or malformed values;
- All-zero or clearly fictitious numbers; or
- Numbers that Red Barn Technology Group has not provisioned or approved.

These controls apply to all outbound calls, including STIR/SHAKEN-signed traffic, and are designed to align with the Upstream Carriers' DNO and invalid-number blocking policies.

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### 4.2 Internal Inbound-Only / Do-Not-Originate (DNO) List

Red Barn Technology Group maintains an internal list of inbound-only / Do-Not-Originate numbers, which includes:

- Main business numbers that are used only for inbound calls (reception, IVR, support queues, etc.);
- Numbers designated by customers as inbound-only; and
- Any numbers that must not be used as originating caller ID by agreement, policy, or regulation.

For these inbound-only / DNO numbers:

- They are configured solely as DID's for inbound routing in 3CX (e.g., to ring groups, queues, or IVRs);
- They are never assigned as Outbound Caller ID for extensions, trunks, or outbound routes; and
- Our provisioning procedures expressly flag these numbers as DNO.

As a result, Red Barn Technology Group's systems do not originate calls that present these inbound-only / DNO numbers in caller ID. This internal DNO control operates alongside the more comprehensive DNO lists and enforcement maintained by our Upstream Carriers.

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## 5. Know Your Customer (KYC) – New and Existing Customers

Red Barn Technology Group implements a Know-Your-Customer (KYC) program that covers both new and existing customers.

### 5.1 KYC for New Customers

It should be emphasized that we do not provide standalone voice-only services. We are a full-service IT provider delivering integrated solutions—including data networking, cybersecurity, cloud services, and systems management—with voice services representing only one element of our overall technology portfolio.

For each new voice customer, Red Barn Technology Group:

#### **Verifies identity and legitimacy**

- Collects legal business name, address, website (if available), and primary contacts.
- Confirms corporate existence using public records (e.g., Secretary of State, business registries) and/or third-party business information sources.
- Verifies tax ID (where provided) and cross-checks contact information against domain / WHOIS / other public resources.

#### **Understands the nature of the business and use of voice services**

- Documents the customer's industry, typical calling patterns, and whether they will use dialers, outbound campaigns, contact-center software, or other automated calling solutions.
- Asks whether the customer will place outbound telemarketing or informational calls to consumers, and whether calls will be prerecorded or live-agent.

#### **Assesses robocall / abuse risk**

- Treats as higher-risk any customer whose business model involves:
  - High-volume outbound campaigns to consumer or wireless numbers;
  - Use of predictive / power dialers, ringless voicemail, or pre-recorded messages; or
  - Prior history of complaints or enforcement issues (as known to Red Barn).

#### **Applies conditional approval and controls**

- For higher-risk customers, Red Barn Technology Group may:
  - Require additional documentation (e.g., sample scripts, consent practices, opt-out procedures);
  - Apply initial call-volume limits or rate-limits; and/or
  - Restrict international or high-cost destinations.

Customers may be refused service if their expected use of the service appears inconsistent with compliance with the TCPA, FCC robocall rules, or other applicable laws.

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## 5.2 KYC for Existing Customers (Ongoing Re-validation)

Red Barn Technology Group applies its KYC program to existing customers on an ongoing basis, not only at onboarding. This includes:

- **Periodic review:** At least annually, we review existing customers' contact information, business description, and calling patterns and update our internal KYC records.
- **Event-driven review:** We trigger an immediate KYC re-assessment when:
  - Traffic patterns change materially (e.g., new high-volume campaigns, new countries, new short-duration traffic);
  - We receive complaints, traceback requests, or carrier notices implicating the customer's traffic; or
  - The customer requests new DIDs, new outbound caller IDs, or expanded outbound capacity.

Based on these reviews, Red Barn Technology Group may tighten restrictions, impose new limits, or terminate service if we determine the customer poses an unacceptable robocall risk.

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## 5.3 Application of KYC to Renewals and Contract Extensions

When a customer renews services, adds significant new capacity, or substantially changes their use-case, Red Barn Technology Group treats that event as a "renewal" for KYC purposes and:

- Re-confirms business identity and contact information;
  - Updates our documentation of their calling use-case; and
  - Re-evaluates whether additional controls are needed (e.g., new rate limits, required consent practices).
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## 6. Call Analytics, Monitoring, and Third-Party Vendors

Red Barn Technology Group employs a layered approach to traffic monitoring and analytics:

### **Internal call-detail and pattern analysis**

We monitor CDRs and 3CX call logs for:

- Sudden spikes in call volume (per extension, per trunk, per customer);
- Large numbers of very short calls (e.g., under a few seconds);
- Unusual time-of-day or geographic calling patterns inconsistent with the customer's expected business; and
- Repetitive calling to the same destination(s) in a short time window.

### **Upstream carrier analytics**

We review call-blocking, error codes, and notifications from our Upstream Carriers that may indicate:

- DNO / invalid-number attempts;
- High-risk or suspicious call patterns; or
- Traffic blocked based on their robocall analytics engines.

### **Third-party call-analytics vendor(s)**

Red Barn Technology Group does not currently employ a separate third-party call-analytics vendor. We rely on a combination of internal traffic analysis (described above) and the robocall analytics and blocking implemented by our Upstream Carriers.

All of the monitoring described in this Section 6 applies to all calls, including STIR/SHAKEN-signed traffic and any non-signed traffic that traverses our network.

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## 7. Detection, Investigation, and Prevention of Illegal Robocalls

### 7.1 Detection Triggers

Red Barn Technology Group investigates traffic when any of the following occur:

- Internal analytics or carrier notices identify abnormal patterns (Section 6);
- We receive consumer complaints or customer support tickets suggesting unwanted or abusive calls;
- We receive traceback requests or other inquiries from the ITG, the FCC, or law-enforcement; or
- Our own staff observes unusual configuration changes or traffic behavior.

### 7.2 Investigation Process

When an issue is detected, Red Barn Technology Group:

- Pulls relevant CDRs, 3CX logs, and configuration data;
- Identifies the involved customer(s), extensions, trunks, and caller IDs;
- Reviews the customer's KYC file and use-case;
- Contacts the customer promptly to:
  - Inform them of the issue;
  - Request explanations, call-scripts, or proof of consent where appropriate; and
  - Require immediate changes if necessary (e.g., pausing campaigns, adjusting dialer settings, modifying caller ID); and
- Documents all findings and corrective actions.

### 7.3 Remedial Actions

Depending on severity and the customer's response, Red Barn Technology Group may:

- Require the customer to modify or suspend specific campaigns;
- Impose tighter rate limits, destination restrictions, or temporary blocks on suspect trunks or extensions;
- Remove or change outbound caller IDs that appear misleading or abusive; and/or
- Suspend or terminate service for customers that:
  - Originate illegal robocalls;
  - Fail to cooperate with investigations; or
  - Fail to implement required remedial measures in a timely way.

These actions apply uniformly to all traffic and are not limited to non-STIR/SHAKEN calls.

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## 8. Cooperation with Traceback and Law Enforcement

Red Barn Technology Group:

- Responds promptly and in good faith to traceback requests from the Industry Traceback Group (ITG), the FCC, and law-enforcement agencies;
- Maintains CDRs, trunk logs, and 3CX configuration history needed to trace suspect traffic back to the responsible customer, extension, or trunk; and
- Commits to respond within 24 hours to traceback requests and related lawful inquiries, consistent with the Commission's rules.

When traceback or law-enforcement inquiries indicate that a customer may be originating illegal robocalls, we:

- Investigate the traffic using the process in Section 7;
  - Notify the customer and require corrective actions; and
  - Suspend or terminate the customer's ability to originate calls if illegal behavior is confirmed or not promptly remedied.
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## 9. Ongoing Compliance, Plan Maintenance, and Updates

Red Barn Technology Group will:

- Periodically review and update this Plan to reflect changes in:
    - FCC rules and enforcement guidance;
    - Industry best practices; and
    - The policies and capabilities of our Upstream Carriers and any third-party analytics vendors.
  - Update its Robocall Mitigation Database filing within required timeframes (including the 10-business-day update requirement) whenever there are material changes to:
    - This Plan;
    - Our STIR/SHAKEN implementation status;
    - Our use of third-party analytics vendors; or
    - Company or contact information.
  - Ensure that internal procedures for 3CX configuration, customer onboarding, KYC, monitoring, and support remain consistent with the commitments in this Plan.
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## 10. Contact Information

### Robocall Mitigation Contact

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