

# Full Robocall Mitigation Plan – Red Road Telecom

**Company Name:** Red Road Telecom

**Type of Provider:** Intermediate and terminating VoIP provider

**Date:** August 2025

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## 1. STIR/SHAKEN Implementation

Red Road Telecom relies on its upstream carriers (including Thing and Vitelity) for STIR/SHAKEN caller ID authentication on IP-originated calls. All outbound SIP traffic is sent through these carriers to ensure authentication is applied at the carrier level.

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## 2. Know Your Customer (KYC) Policies

Before activating any new customer account or assigning numbers, Red Road Telecom verifies customer identity and service legitimacy. Our KYC procedures include:

- Collecting valid business registration or government-issued ID.
  - Verifying billing information and service address.
  - Screening intended service use cases for compliance with FCC robocall rules.
  - Rejecting or terminating service for customers engaged in prohibited robocalling.
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## 3. Monitoring and Traffic Analysis

Red Road Telecom monitors customer traffic for indicators of illegal robocalls, including:

- High-volume, short-duration call patterns.
- Unusually high attempts to invalid/unallocated numbers.

- Complaints received from carriers, regulators, or consumers.
- Patterns flagged by the Industry Traceback Group (ITG).

Suspicious activity is investigated promptly.

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#### **4. Enforcement and Remediation**

If a customer is identified as originating illegal robocalls, Red Road Telecom takes immediate action:

- Suspend outbound calling during investigation.
  - Terminate service for confirmed violations.
  - Cooperate with carriers, ITG, and the FCC in stopping unlawful traffic.
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#### **5. Consumer Complaint Handling**

Red Road Telecom accepts robocall-related complaints via phone and email. All complaints are logged, investigated, and addressed with corrective actions when necessary.

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#### **6. Certification and Compliance Contact**

This Robocall Mitigation Plan is certified by the company's officer, David Rodman, as required by the FCC.