

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Ricoh-USA, Inc. (“Ricoh”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls, as of October 1, 2021. Ricoh reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time as it deems appropriate to reflect its business, its capabilities, and its needs.

Company Background

Ricoh is a provider of managed services, technology solutions, and business transformation services. Ricoh is headquartered in Pennsylvania, and provides services to business customers in many states.

STIR/SHAKEN Implementation

Ricoh relies on its vendors to provide a platform for high quality voice, data and video communications. As a managed services provider, it is not clear that Ricoh is a “voice services provider” or is subject to 47 C.F.R. § 64.6301, et seq., including the requirement in §64.6301(a) to implement the STIR/SHAKEN call authentication framework.

Further, due to the nature of its services and the business of its customers, Ricoh is not a significant source of illegal robocalls. Ricoh does not originate robocalls on its own behalf. Nor does it provide telephony services that permit Ricoh’s customers to originate robocalls.

However, if the STIR/SHAKEN implementation obligation is applicable, Ricoh qualifies for the extension contained in 47 C.F.R. §64.6304 for small voice providers (Ricoh serves 100,000 or fewer voice service access lines). Ricoh, therefore, out of an abundance of caution, submits this Robocall Mitigation Plan.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that Ricoh has implemented to detect and prevent illegal robocalls on its network as of October 1, 2021. The measures described below explain how Ricoh mitigates and addresses the risk that it will originate illegal robocall traffic. Ricoh will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should it determine that changes are appropriate, its practices may differ from those described below.

Measures to Prevent or Avoid Exchanging Illegal Robocalls

Customer Due Diligence. Ricoh conducts due diligence on new and renewing customers, confirming the customer’s identity and legal organization. Ricoh confirms each customer’s service address(es). Ricoh also assesses the customer’s business reputation and responds to material changes of information when customer contracts are renewed or services are added. In addition, customers are required to discuss with Ricoh any request for services that involves permitting the customer’s computers or system to

connect to a telephony service Ricoh or a Ricoh vendor provide. Ricoh typically prohibits customers from using its services to support predictive dialing and other potential robocall traffic and also prohibits illegal uses. Ricoh may take action, including suspension and/or termination for any unlawful robocall traffic.

- **Network Monitoring.** Ricoh's vendors (the upstream carriers) monitor their networks for fraudulent or suspicious traffic. In the event potential fraud is detected, Ricoh will continue to take action to mitigate the potential fraud, including temporary or permanent blocking of traffic and efforts to identify the source of the traffic.

Responding to Traceback Requests

- Ricoh commits to responding, to the extent permitted under applicable law, with valid traceback requests from the Commission, law enforcement or the Industry Traceback Group (ITG).
- Ricoh will periodically review records of traceback requests to identify customers that are the subject of a pattern of traceback inquiries. Ricoh will determine an appropriate action to take on a case-specific basis, which may include directing the customer to remedy the problem and, if effective action is not taken, temporary suspension of the customer and/or termination of the customer's service.

Cooperation with State and Federal Regulators

Ricoh will cooperate, to the extent permitted under applicable law, with valid requests from the Commission, or law enforcement to identify and stop any illegal robocallers that use Ricoh services to originate calls. Specifically, consistent with applicable law, Ricoh will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures in a manner that is proportionate to the size and nature of its business, with the goal of maximizing the mitigation of illegal robocalls by Ricoh customers.