

RED RIVER TECHNOLOGY LLC
RED RIVER MANAGED SERVICE LLC f/k/a CWPS
Robocall Mitigation Plan
Updated: September 2025

STIR/SHAKEN IMPLEMENTATION

Red River Technology LLC and its affiliate, Red River Managed Services LLC, f/k/a CWPS entities listed above (collectively, “Red River” or individually, “Company”) voice service provider. Red River does not own or control facilities that would enable it to implement the STIR/SHAKEN authentication framework. Accordingly, the Company is exempt from a STIR/SHAKEN implementation obligation. *See First Caller ID Authentication Report and Order*, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

ROBOCALL MITIGATION

Background

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback:

Red River is committed and will respond to traceback requests received from the Commission, law enforcement agencies, and the industry traceback consortium within 24 hours and will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. Red River will devote sufficient resources to provide prompt and complete information to traceback requests. The Company’s point of contact to handle all traceback requests is:

Name	Title	Contact Information
George Shalhoub	Senior Director - Contract	Ph: 571-353-6332 Email: George.shalhoub@redriver.com

Upon receiving a traceback request, One Click will provide Bandwidth call logs needed to investigate the suspect calling.

2. Take Steps to Mitigate Illegal Traffic

Red River provides Unified Communications as a Service to our customers on solutions hosted by Red River and our partners. Our customer environments are managed by Red River service desk or jointly by our service desk and the customer and we have strong relationships with our customers to understand their business operations. The Company has procedures in place to prevent new and renewing customers from using our network to originate illegal robocalls.

3. Measures to prevent origination of illegal calls

Know Your Customer:

Red River thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services. The Company also confirms the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.

Know your Upstream Providers:

Red River relies on its underlying carrier, Bandwidth, to ensure that upstream providers are Stir/Shaken compliant and have registered in the RMD, and to block any illegal traffic coming from upstream providers.

Telephone Number Validation:

All calls must have caller-ID values, and for auto-dialed calls, each value must be checked against the list of numbers that the customer provided, and that company's staff vetted before establishing service.

Network Monitoring:

The Company monitors, through its Regulatory Compliance Consultant, the efforts of the Federal Trade Commission and the Federal Communication Consultant in regards to their robocall mitigation efforts, identification or industry trends, provision of consumer education materials, and other related information and alerts.

Call Blocking:

If it is determined that a Red River customer is originating prohibited unlawful robocalls on the network, Red River will first warn the customer to stop and then terminate their service if the customer does not comply.

International Calling:

Red River does not sell services to international call originators using North American Numbering Plan Numbers.

Call Analytics:

As a reseller, the Company relies on its underlying providers and/or their third-party vendors to determine if originating calls should be blocked based on call analytics. The Company does not use any third-party analytics vendors.

4. Acceptable Use Policy

The Company has prepared an Acceptable Use Policy ("Policy") as a guide for its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our unlimited calling plans and features.

5. Contact for Robocall Mitigation-Related Issues

The Company will update its Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

George Shalhoub

Ph: 571-353-6332

Email: George.shalhoub@redriver.com