

December 23, 2024

By email to: EnforcementBureauTCD@fcc.gov

and by Regular U.S. Mail to:

Office of Secretary

Federal Communications Commission

45 L Street NE

Washington, DC 20554

ATTN: Enforcement Bureau – Telecommunications Consumers Division

Re: Response to DA 24-1235 - The Redcliffe Group, LLC (RMD0010185) -
Robocall Mitigation Database Certification Update

To Whom It May Concern:

The Redcliffe Group respectfully submits this Response to the FCC's Order DA 24-1235 released on December 10, 2024, regarding required updates to Robocall Mitigation Database (RMD) certifications.

As outlined below, our company maintains comprehensive robocall mitigation measures that meet the requirements referenced in the Order. Our RMD certification has been updated to reflect the measures below.

1. Existing Robocall Mitigation Implementation.

- We maintain SOC 2 Type 2 certification, demonstrating our commitment to security and compliance
- Our upstream provider, Bandwidth.com, implements STIR/SHAKEN authentication for all calls. For your further information, we submit herewith a copy of an email from our upstream provider confirming its implementation of STIR/SHAKEN authentication, as well as its implementation of other procedures to prevent robocalling.
- We utilize Bandwidth's robust robocall mitigation system, along with our own stringent protections against unauthorized access and use by robocall systems.

2. Current Certification Status

- Our business information and contact details are current and complete
- STIR/SHAKEN implementation is handled through our certified upstream provider Bandwidth.com

- Robocall mitigation is handled both within our network and by our certified upstream provider
- We have no prior enforcement actions to disclose
- We have the capability to respond to traceback requests well within the required 24-hour window

We are fully compliant with the Commission's robocall mitigation requirements and maintain active monitoring of these systems. Our RMD certification has been updated to reflect these existing measures.

Please contact Charlie Griffin at cgriffin@bridge.insure with any questions regarding this response.

Sincerely,

Charlie Griffin
COO
The Redcliffe Group, LLC
RMD0010185

Charlie Griffin

From: Ryan Henley <ryan@reply.bandwidth.com>
Sent: Tuesday, February 22, 2022 2:45 PM
To: Charlie Griffin
Subject: 'EXTERNAL'Your traffic is fully supported

Dear Customer,

Bandwidth has long been a vocal advocate and an early adopter of STIR/SHAKEN to prevent robocalling. We have engaged with the FCC and other industry members for years to help our customers be aware of and prepare for this necessary regulation and help solve this nuisance to society.

The vast majority of all of Bandwidth's services and traffic are fully STIR/SHAKEN capable and only a small fraction of our customers utilize the legacy equipment that is at the center of this matter. The accounts on the legacy equipment will be migrated to fully capable STIR/SHAKEN services as soon as possible.

You are NOT one of those customers. Your traffic is fully supported by Bandwidth's STIR/SHAKEN capabilities.

Bandwidth has robust procedures to prevent robocalling, including screening potential customers and monitoring traffic. We are proud to lead the industry in protecting consumers from unwanted traffic and appreciate your support along the way.

If you have any questions, please feel free to contact our support teams by opening a [support ticket](#).

Warmly,

Ryan Henley

Chief Customer Officer

[Bandwidth.com](#) • 900 Main Campus Drive, Raleigh, NC 27606, USA



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