



Robocall Mitigation Strategy and Policy

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Ring-u LLC provides services specifically to small businesses, less than 10 lines and 50 extensions typically and seeks to comply with the December 2019 Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and more importantly the intentions of limiting robocalls, spoof, illegal and similar unwanted calls.

1. Ring-u LLC primarily provides services using an on-site and hosted PBX with a pricing model that works well for traditional location based businesses. This makes it unattractive for creators of unwanted calls. Statistically, most of our traffic is inbound, not outbound.
2. Robocalling and similar behavior is against our terms of service and business model.
3. All outgoing calls are subject to robocall detection and mitigation.
 - a. Call volume is constantly monitored and on our system dashboards.
 - b. Call volume and rate is limited by our upstream provider and we stay well under those limits.
 - c. Ring-U knows our upstream providers very well.
 - d. Ring-U knows its customers very well.
 - e. Ring-U originates calls through our upstream providers, who do the actual outbound Stir/Shaken attestation.
 - f. C-Level attestations are monitored and are typically a quickly resolved new customer configuration issue.
4. All outbound calls use phone numbers and Caller ID/CNAME set by ring-u and verified by our staff on system setup as valid and apropos for the customer. End users can not modify the Caller ID of outbound calls.
5. All customers have a confirmed local/regional phone number and address also tied to the E911 system.
6. Ring-U customers rarely change / add / delete phone numbers. Our average customer has 2 or 3 phone numbers and does not “turn and burn” phone numbers. Such changes involve our customer support staff and are not automated.
7. Ring-u LLC limits the origination capacity of customers by system, both in number of concurrent calls and rate limiting the origination capacity.

8. Ring-U LLC constantly monitors the call volume and connection length of incoming and outgoing calls for completion percentages and call length. While our primary goal is monitoring system performance, it is a key indicator of aberrant behavior. Historically it has found typical problems such as a phone stuck in redial, or call loops. It will also detect robocallers.
9. All systems are constantly monitored for call spoofing attempts by malicious actors, and a dynamic shared response system blocks the IP or net block of bad actors across all systems.
10. In coordination with our upstream providers, Ring-U has implemented STIR/SHAKEN through them, reports of every call with attestation status are available and often reviewed for lack of attestation.
11. If robocalling is detected or reported and traceback is requested, Ring-U staff and systems will react and stop it in less than 24 hours. In practice with other important issues, we are much more responsive than that and expect it would take less than an hour.
12. To date, since 2017 when we started offering services, Ring-U has **not had a robocalling report or incident**. Ring-U has not had any "Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing"

I hereby certify the above to be correct and true and implemented by:
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