

Flourish RCS, LLC Robocall Mitigation Plan

Business Information

Flourish RCS, LLC
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Contact Information

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Commitment

Flourish RCS, LLC commits to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers using its service to originate or transit calls into the U.S. and its territories.

The Company has fully implemented STIR/SHAKEN via its upstream provider: Bandwidth.com.

Flourish RCS commits to fully responding immediately to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Flourish RCS's service to carry or process illegal calls. When notified by the FCC's Enforcement Bureau, Flourish RCS shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Flourish RCS's investigation determines that the traffic is not illegal) when Flourish RCS receives a written notice of such traffic from the Enforcement Bureau. If Flourish RCS determines that the identified traffic is not illegal, Flourish RCS shall provide the Enforcement Bureau with an explanation as to why Flourish RCS reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

Know Your Customer

Flourish RCS uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks.

The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are vetted with a combination of electronic and manual verification systems, references, and previous experiences with customer officers and employees.

In most cases, the customers signing up for our voice call services have been customers of ours for many years and we are intimately familiar with how they will be using our networks. Very little voice traffic has been sent using our services since instituted in 2022.

Know Your Upstream Provider

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, Flourish RCS, LLC provides the following information concerning its upstream voice service carrier:

Bandwidth.com
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
(855) 864-7776
voicesecurity@bandwidth.com

Flourish RCS's agreement with its upstream provider contains no provision specific to robocall mitigation. Flourish RCS has, however, received assurances from Bandwidth that it has, and will continue to, sign calls transmitted to Flourish RCS, and will work closely with Flourish RCS to mitigate illegal robocall traffic.

Flourish RCS reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. Flourish RCS is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Flourish RCS's networks.