

Robocall Mitigation Plan

Business Information

Ringfree Communications, Inc.
4330 South Lee Street
Building 800B
Buford, GA 30518

Contact Information

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Overview

In the Commission's release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outlines "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Ringfree Communications, Inc. ("Ringfree") is dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. Ringfree is fully STIR/SHAKEN compliant. In compliance with the R&O, Ringfree submits this RMP and certification.

Know Your Customer

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Ringfree in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

New Subscribers

All new subscribers go through identity verification protocols which are a mixture of algorithmic check and manual call back. All new subscribers go through a multi-week process that includes data gathering stages and verification. Ringfree does not allow clients to sign up online or anonymously. A risk score is developed to ensure the authenticity of a new subscriber. This score checks the identity marker collected during an account registration process. These include but are not limited to: name, email address, credit card information and contact phone number.

These identity markers are validated for accuracy against public and paid tools. All new subscriber activity is monitored as further explained below.

Existing Subscribers

Ringfree require updates of subscribers' information on all their orders. Each order's identity markers are verified again to ensure the account is not compromised and is being used for its intended purpose. The process is the same as the new subscriber process.

Acceptable Use Policy

Ringfree maintains an Acceptable Use Policy ("AUP") that subscribers must agree to before being permitted to use Ringfree's network. Among other things, this AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Ringfree's service to engage in or in connection with fraudulent activities. Ringfree's contractual terms with subscribers specify that Ringfree may take action up to suspension or termination of service for violation of the AUP.

Know Your Upstream Providers

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, Ringfree provides the following information concerning its upstream voice carrier.

Ringfree receives voice traffic from the following upstream provider:

Bandwidth.com
900 Main Campus Dr.
Suite 500
Raleigh, NC 27607
Andrew Barker
abarker@bandwidth.com

This upstream provider abides by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Ringfree. Ringfree and its upstream provider work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Ringfree and/or obtained by Ringfree from one of Ringfree's underlying carriers for use by the subscriber. In most cases, Ringfree directly manages the TNs used by its subscribers. Ringfree tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Ringfree's assignment of the TN to its subscriber. If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Ringfree, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Ringfree will attest calls originated with these TNs.

When originating a call, Ringfree checks the calling party number against Ringfree's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

Mitigation Through Contracts

All subscribers agree to participate in traceback requests (this is part of the Terms and Conditions which users must agree to when creating an account with us). All subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features include requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Ringfree works with its upstream carrier to analyze high-volume voice traffic to identify and monitor patterns consistent with robocalls. Both carriers' systems alerts Ringfree to calling patterns with unusual spikes, traffic patterns, and related matters. If a calling pattern is detected that is consistent

with illegal robocalls, Ringfree and its upstream provider will identify the party that is using its network to transmit those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

No third-party vendors are involved in deploying Ringfree's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted which follows the defined procedures on investigating such subscribers. The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends; • checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Ringfree follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Ringfree will devote sufficient resources to provide prompt and complete resources to traceback requests. Ringfree will investigate suspicious activity found by its monitoring systems or reported to Ringfree by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Ringfree contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

Blocking

Ringfree will implement Do Not Originate requests it receives from the ITG. If Ringfree's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Ringfree will work with its upstream provider to take appropriate action which may include suspending or terminating the subscriber's use of Ringfree's network. Ringfree will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, the state attorney general's office, etc.), to the FCC and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Ringfree will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Ringfree will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of David Wessell

I, David Wessell, Owner of Ringfree Communications, Inc. ("Ringfree") do hereby certify, under penalty of perjury, the following:

- a. Ringfree has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. Ringfree's business name and primary address are as follows:

Ringfree Communications, Inc.
4330 South Lee Street
Building 800B
Buford, GA 30518

- c. Entities that own 10% or more of Ringfree are: **David Wessell. Molly Wessell**
- d. None of the persons/entities listed above have had licenses revoked by the FCC or have been subject to FCC enforcement actions.
- e. Ringfree does not have any other business name.
- f. Ringfree has not previously used any other business name.
- g. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- h. Ringfree's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation to serve end-users.
- i. Ringfree has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- j. Ringfree is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- k. Ringfree's Operator Code Number is 317K.



David Wessell