

Rise Advisory Inc Robocall Mitigation Program Description

I. Introduction

Rise Advisory Inc is committed to preventing the origination and transmission of illegal and unwanted robocalls across its network. In compliance with the Federal Communications Commission's (FCC) rules and the guidelines outlined in 47 CFR § 64.6305, Rise Advisory Inc has implemented a comprehensive Robocall Mitigation Program. This Program integrates robust know-your-customer (KYC) procedures, advanced call analytics, STIR/SHAKEN authentication where applicable, and close cooperation with enforcement and traceback efforts, thereby ensuring that Rise Advisory Inc takes reasonable and effective steps to mitigate unlawful calling activity.

II. Company Background and Contact Information

- **Corporate Name and Address:**
Rise Advisory Inc
16192 Coastal Highway, Lewes DE 19958
- **Primary Robocall Mitigation Contact:**
Abrar Ebel, President
arahimi@rise-advisory.com

III. Roles in the Call Chain

Rise Advisory Inc functions as a voice service provider and gateway provider. Accordingly, Rise Advisory Inc focuses its mitigation efforts on the call origination and/or transit stages to ensure that no illegal traffic enters or passes through its network.

IV. Compliance with STIR/SHAKEN

Rise Advisory Inc has fully implemented STIR/SHAKEN on the IP portions of its network. Calls originating from Rise Advisory Inc's IP network are authenticated and signed when technically feasible, allowing terminating providers and analytics engines to more reliably identify potential spoofed calls. For any parts of the network still undergoing migration to IP or where STIR/SHAKEN cannot yet be implemented, Rise Advisory Inc applies other mitigation measures as described below.

V. Know-Your-Customer (KYC) Procedures

1. Customer Onboarding:

Before activating service for a new customer, Rise Advisory Inc verifies the customer's identity and the legitimacy of their intended use of calling services. This includes:

- Collecting and verifying business registration documents.

- Screening for known bad actors or previously suspended/terminated customers.

2. **Service Terms and Conditions:**

Customers must agree to strict terms prohibiting the origination of illegal robocalls. Customers found in violation of these terms are subject to immediate service suspension or termination.

VI. Call Analytics and Traffic Monitoring

Rise Advisory Inc employs third-party call analytics tools to detect patterns indicative of illegal robocalling. These measures include:

- **Automated Analysis:** Real-time screening of call signaling data, call volumes, call duration, and call destination patterns to identify suspicious activity.
- **Threshold Monitoring:** Establishing normal call patterns per customer. Sudden spikes in short-duration calls or unusual calling patterns trigger alerts and potential account review.
- **Regular Audits and Reviews:** Periodic manual reviews of traffic patterns are conducted by Rise Advisory Inc's compliance team to identify emerging fraud patterns and refine mitigation strategies.

VII. Upstream and Downstream Provider Vetting

Rise Advisory Inc maintains a list of vetted, reputable upstream and downstream carriers, ensuring they have demonstrated a commitment to mitigating illegal traffic. Before establishing or renewing interconnection agreements, Rise Advisory Inc assesses:

- The partner's Robocall Mitigation Database certification status.
- Historical cooperation in traceback and enforcement actions.
- Publicly available enforcement actions or regulatory findings related to the provider.

Should any interconnecting provider fail to meet these standards, Rise Advisory Inc will re-evaluate or suspend the partnership to prevent entry of illegal traffic into its network.

VIII. Rapid Response to Traceback Requests (Within 24 Hours)

Rise Advisory Inc has established internal procedures to respond fully and promptly to traceback requests from the FCC, law enforcement, the US Telecom Industry Traceback Group, or other authorized third parties. Upon receiving a request:

- The Compliance Team prioritizes the inquiry to ensure a comprehensive response within 24 hours.

- Relevant call detail records and supporting information are immediately retrieved.
- Cooperation is given to identify the source of suspicious traffic and, if necessary, terminate the offending customer's account.

IX. Ongoing Training and Awareness

Rise Advisory Inc provides regular training to its network operations and compliance staff on the evolving nature of robocall schemes, FCC rules and guidance, and best practices in detection and mitigation. Internal policies are reviewed and updated at least annually or as regulatory requirements change.

X. Cooperation with Enforcement Agencies and Authorities

In addition to proactive mitigation efforts, Rise Advisory Inc commits to full cooperation with FCC enforcement actions, state attorneys general, and other regulatory authorities. This may include providing data, testimony, or other support for investigations into illegal robocalling activity.

XI. Continuous Improvement

Rise Advisory Inc recognizes that illegal robo callers continually adapt their strategies. To remain effective, Rise Advisory Inc regularly evaluates the performance of its mitigation techniques and invests in advanced analytics solutions, updated training, and revised policies to stay ahead of new threats.

Conclusion:

Through strict customer vetting, advanced call analytics, STIR/SHAKEN implementation where applicable, timely traceback cooperation, and proactive network monitoring, Rise Advisory Inc maintains a robust Robocall Mitigation Program. These efforts collectively help ensure that illegal robocall traffic is minimized and that Rise Advisory Inc remains compliant with FCC requirements.