

Ripple Fiber Robocall Mitigation Plan

This Robocall Mitigation Plan submitted by Ripple Fiber, LLC (Ripple Fiber) pursuant to the provisions of 47 C.F.R. § 64.6305 describes the process and procedures that Ripple Fiber uses to alleviate the origination of illegal robocall traffic on its network and to minimize or eliminate the possibility of outbound illegal robocalls originating on its network.

Ripple Fiber views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its VoIP network. In addition to following these steps, Ripple Fiber commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robot callers that may use its service to originate calls.

Stir/Shaken Implementation

Ripple Fiber has not implemented the STIR/SHAKEN authentication framework on any portion of its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Ripple Fiber’s service to originate illegal robocalls.

Ripple Fiber uses an upstream VOIP carrier to process all outbound calls which in turn signs the calls as part of its service to Ripple Fiber. Ripple Fiber’s upstream VoIP service carrier:

- Ensures all calls are sent in compliance with STIR/SHAKEN.
- Signs all outbound calls received from our network.
 - Outbound IP-based calls from Ripple Fiber to the carrier using U.S. phone numbers in their account are signed with “A” or full attestation.
 - Outbound IP-based calls from Ripple Fiber to the carrier using phone numbers that are not in their account are signed with “B” or partial attestation.
 - Ripple Fiber does not perform any international calls and does not use “C” or gateway attestation; however, our carrier does perform this service for customers requiring it.
- Carrier does not place outbound calls from any customer, including Ripple Fiber, that does not have a registered Robocall Mitigation Plan on file.

Additional steps taken by Ripple Fiber Services.

- Ripple Fiber prohibits customer from conducting outbound marketing campaigns and will discontinue services if such campaigns are discovered, even if the originating number is not flagged as SPAM.
- Ripple Fiber does not allow customers to provide political messaging or polling calls to the general public.
- Ripple Fiber will promptly disable customers from placing outbound robocalls that are in violation of the policies set forth herein.

Customer Vetting Practices

As a means of preventing or minimizing the origination of illegal robocalls through its outbound voice services, Ripple Fiber vets the identity of all of its voice service subscribers to determine the legitimacy of a customer for the purpose of establishing a service relationship. Ripple Fiber confirms the identify of all business customers using its outbound voice services through collecting information such as physical customer location, contact person(s), state of incorporation, federal tax ID, and the nature of the customer's business.

Telephone Number Validation Practices

With respect to meeting existing obligations and to take affirmative, effective measures to prevent customers from originating illegal calls, Ripple Fiber has implemented the following practices.

- Ripple Fiber provides outbound notifications for business entities only.
- Ripple Fiber onboards potential business customers that have a legitimate business reason for using an outbound call service provider.
- No marketing, advertising, polling, religious, or political messages are allowed.

Outbound Call Queuing

Ripple Fiber does not allow customers to place outbound robocall campaigns.

History of Enforcement Actions

As of the date of this Revision, Ripple Fiber has not performed any robocall enforcement actions. There have not been any observed or reported violations to require it. If any actions are required in the future, Ripple Fiber will update this document and detail the steps taken.

International Call Origination

Ripple Fiber is not currently an international voice services provider. If at any time Ripple Fiber does decide to sell services to customers which are international call originators using North American Numbering Plan resources, Ripple Fiber will familiarize itself with and develop best practices for vetting such customers and performing telephone number validation on all international originated calls.

Traceback Requests

Ripple Fiber will actively cooperate with the FCC, law enforcement and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Ripple Fiber will dedicate sufficient resources to provide prompt (within 24 hours) and complete responses to traceback requests. As part of its efforts to assist in the successful traceback of illegal robocalls, Ripple Fiber will include within its carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged.

Know Your Upstream Provider Procedures

Ripple Fiber has a longstanding relationship with its upstream provider and maintains awareness of the nature of their businesses and the legitimacy of their call transmission services. Ripple Fiber has chosen an upstream provider with a proven track record of robocall mitigation and monitoring. Further, Ripple Fiber, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that Ripple Fiber's upstream provider is equally committed to eliminate illegal robocalls. This includes the use of robocall prevention language in any contracts that Ripple Fiber may directly have with its upstream provider.

Ripple Fiber's upstream provider signs all calls received from our network and calls are sent in compliance with STIR/SHAKEN.

Ripple Fiber may establish a relationship with additional upstream provider(s) in the future at which time all articles contained in this RMD will be fully implemented in the new relationship.

Ongoing Robocall Mitigation Practices

Ripple Fiber monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. If network usage patterns consistent with illegal robocalls are detected or Ripple Fiber otherwise suspects illegal robocalling is taking place on its network, Ripple Fiber will immediately seek to identify the party that is queuing these calls so that it may take appropriate action. The actions taken may include, but are not limited to: initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name; terminating the party's ability to originate, terminate, or route calls on Ripple Fiber's network; and providing notice to law enforcement authorities.

As part of its Plan to mitigate and prevent any originating illegal robocalls on its network, Ripple Fiber is committed to early identification and investigation of possible robocalling situations. In monitoring usage of its network, particular attention is given to: higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); originating calls of short duration and low call completion percentages; originating calls with sequential called to number dialing patterns; and calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.

Traceback Request Single Point of Contact

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