

Robocall Mitigation Plan

Ring4, LLC is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls. This filing updates Ring4, LLC robocall mitigation efforts and procedures per FCC DA 24-73 and in compliance with 47 CFR § 64.6305.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic.
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium.
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls.

Ring4, LLC purchases origination, termination, and hosted-switch access from Intelliquent, Inc. (FRN 0011583671) ("Provider") who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to Ring4, LLC. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

International Subscribers

Ring4, LLC. does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

Ring4, LLC. maintains an Acceptable Use Policy ("AUP") that subscribers must accept before being permitted to use LoKT Client's broadband or voice services.

Traceback Requests

Ring4, LLC. is committed to responding in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Provider, and the industry traceback consortium. Furthermore, LoKT Client is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use LoKT Client's service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to traceback@ring4.com for immediate processing by Ring4, LLC.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our Provider monitors originating voice traffic using real-time analytics and machine learning algorithms to prevent illegal robocalls through various industry-standard methods. Among them are alerting if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Also, Provider complies with the TRACED Act and cooperates with the Traceback Consortium to proactively identify robocalls. The provider will immediately ask Ring4, LLC. to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If Ring4, LLC. or Provider determines that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period.
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration

- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation

Provider has acknowledged to Ring4, LLC. that it is currently authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on our network.