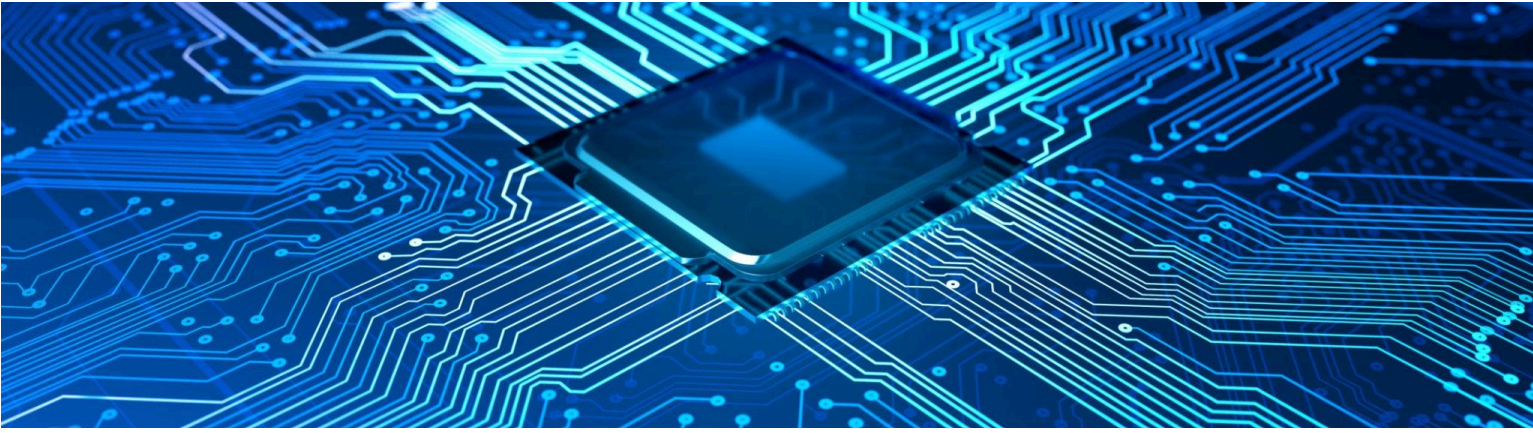




R LLC

ROBOCALL MITIGATION
PROGRAM

R LLC certifies that all of the calls that it carries or processes on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(c). R LLC does not carry or process illegal robocall traffic, and commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. R LLC will cooperate with such entities in investigating and stopping any illegal robocallers that use R LLC as a conduit for processing calls. R LLC certifies that no prior certification has been removed by Commission action, and R LLC has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has not implemented the STIR/SHAKEN authentication framework on any portion of its network for carrying or processing calls.

CONTACT INFORMATION

Abuse

Name

Rajan Patel

Email

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Phone number

(732) 334-8554

Address

701 Vintage Creek Drive Weddington NC 28104

Communication Priority

Email, Text Message, Telephone, Snail Mail

The increasing prevalence of illegal robocalls necessitates a robust mitigation strategy. R LLC is committed to safeguarding users by implementing industry best practices and utilizing advanced technology provided by SIP trunk providers to manage both inbound and outbound call traffic.

IMPLEMENTATION STEPS

- STIR/SHAKEN
- Call Blocking & Filtering
- Traffic Analysis
- Traceback Cooperation
- User Education

STIR/SHAKEN

R LLC has not deployed a STIR/SHAKEN caller authentication framework to validate the identity of originating callers. We rely on FCC-registered SIP trunk providers for call handling and comply with all robocall mitigation requirements as an intermediate provider.

We require all SIP trunk providers to certify STIR/SHAKEN compliance and maintain FCC RMD filings.

Call Blocking & Filtering

R LLC manages, maintains, and monitors Asterisk servers on behalf of its clients. All IP traffic entering and exiting the Asterisk servers is validated and associated with a specific user. Call Blocking and Filtering policies are enforced on a per PBX and per SIP endpoint basis, to eliminate all unauthorized connections. Credentials for the PBX and SIP endpoints are not provided to the end user. Calls are limited to pre-approved SIP trunk providers that are registered in the FCC's Robocall Mitigation Database.

R LLC enforces IP whitelisting for SIP traffic, blocking unauthorized endpoints. All SIP trunks require strong passwords and are configured to reject and ban IPs attempting to make unauthenticated calls. R LLC disables SIP REFER and anonymous calls to prevent spoofing.

Traffic Analysis

R LLC reviews traffic reports to monitor for unusual activity. This entails a detailed and ongoing review of CDR logs from SIP trunk providers, CDR and CEL records in the PBX, and fail2ban activity on the servers. All suspicious traffic is investigated.

Traceback Cooperation

When requested and with proper authorization, R LLC cooperates with law enforcement agencies, the FCC, and industry traceback consortia. When requested, R LLC provides timely information for traceback investigations within 24 hours or other specified deadlines. R LLC's commitment to assisting in stopping illegal robocalls is unwavering.

User Education

R LLC has no customers via 3rd-party voice platforms, and does not provide SIP credentials to any users directly. We educate our users about our product's voice and fax capabilities, and ensure sensible security practices are followed for all SIP endpoints that R LLC deploys on-premises.

MITIGATION MEASURES

- Risk Assessment
- Know Your Customer
- Enforcement

Risk Assessment

R LLC is a Linux systems management provider offering managed PBX services with connectivity via national third-party networks to selected users. R LLC does not service consumer markets. R LLC does not directly switch calls, nor is it directly involved with the voice service's call processing. All users are known to R LLC and generally do not originate high-volume calls. Therefore, R LLC does not consider its network to be at high risk of originating illegal robocalls.

Know Your Customer

- R LLC users have their identities verified in person, and publicly available business-related incorporation documents have also been verified.
- R LLC confirms the user's service address.
- R LLC's Principal, Rajan Patel, is the point of contact for every user.
- R LLC verifies each user's business and history before providing service.
- R LLC verifies user information when contracts are renewed or services are added.
- R LLC verifies the user's identity and their right to use the telephone number presented on calls.
- R LLC has policies that define the circumstances by which it will deny, suspend, or terminate service to a user.

Enforcement

If R LLC has a reasonable basis to believe that a user is originating illegal robocalls or if a pattern of questionable activity is detected, the user's PBX will be terminated and reprovisioned with new credentials. R LLC will suspend and/or terminate the user's service if it is determined the illegal or questionable activity was deliberate.

Addendum

Specific FCC Regulation – Provides more specific guidance to the FCC’s robocall rules and our MRP.

64.6305 Robocall mitigation and certification.

(f) Certification by non-gateway intermediate providers in the Robocall Mitigation Database.

(1) A non-gateway intermediate provider shall certify that all of the calls that it carries or processes on its network are subject to a robocall mitigation program consistent with paragraph (c), that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and to one of the following:

- (i) It has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it carries or processes are compliant with § 64.6302(b);
- (ii) It has implemented the STIR/SHAKEN authentication framework on a portion of its network and calls it carries or processes on that portion of its network are compliant with § 64.6302(b); or
- (iii) It has not implemented the STIR/SHAKEN authentication framework on any portion of its network for carrying or processing calls.

(2) A non-gateway intermediate provider shall include the following information in its certification made pursuant to paragraph (f)(1) in English or with a certified English translation:

- (i) Identification of the type of extension or extensions the non-gateway intermediate provider received under § 64.6304, if the non-gateway intermediate provider is not a foreign provider, and the basis for the extension or extensions, or an explanation of why it is unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN;
- (ii) The specific reasonable steps the non-gateway intermediate provider has taken to avoid carrying or processing illegal robocall traffic as part of its robocall mitigation program, including a description of any procedures in place to know its upstream providers and the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name of such vendor(s);
- (iii) A statement of the non-gateway intermediate provider’s commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

R LLC adheres to the above robocall mitigation practices and will update this program as needed to remain compliant with FCC rules.

A handwritten signature in black ink, appearing to read 'Rajan Patel', is positioned above a horizontal line.

Rajan Patel

R LLC Principal and Owner

March 24, 2025