



Robocall Mitigation Policy and Procedures

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1.0 Introduction and Policy Statement

As the Director of Solutions Architecture of RingTrio, LLC, I recognize the critical importance of maintaining the integrity of the public switched telephone network (PSTN) and protecting consumers from the scourge of illegal and unwanted robocalls and malicious caller ID spoofing. Our mission at RingTrio is to provide cutting-edge contact center software solutions that empower legitimate businesses to communicate effectively with their customers. However, this mission is inextricably linked with the responsibility to ensure our platform is not misused for nefarious purposes.

This Robocall Mitigation Policy and Procedures document outlines RingTrio, LLC's commitment to combating illegal robocalling and caller ID spoofing in accordance with all applicable federal laws and regulations, including but not limited to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and the rules promulgated by the U.S. Federal Communications Commission (FCC). While the RingTrio platform is built upon the robust underlying technology provided by our trusted white-label partner, Skyswitch, RingTrio, LLC is the direct provider of services to our customers and assumes the responsibility for implementing and enforcing this comprehensive mitigation program for all traffic originating from or traversing our network on behalf of our customers.

A fundamental principle of this policy is the clear delineation of responsibility. While RingTrio provides the technological conduit and implements network-level mitigation strategies, the **customer bears ultimate and sole liability** for the content, nature, and legality of the calls they originate using the RingTrio platform. Customers are responsible for ensuring their calling practices comply with all federal and state laws and regulations, including obtaining necessary consents and adhering to telemarketing rules.

This document serves as a binding agreement between RingTrio, LLC and its customers, detailing the procedures and expectations necessary to collectively mitigate illegal robocalling and maintain a trustworthy communications ecosystem. Adherence to this policy is mandatory for all users of the RingTrio contact center software.

1.1 Purpose

The purpose of this document is to:

- Articulate RingTrio, LLC's commitment to robocall mitigation and regulatory compliance.



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- Detail the regulatory framework governing robocalls and caller ID spoofing.
- Describe RingTrio's multi-faceted robocall mitigation program.
- Clearly define the obligations and liabilities of RingTrio customers.
- Provide specific procedures for both customers and RingTrio personnel to ensure compliance.
- Outline the consequences of non-compliance.
- Meet the requirements for filing in the FCC Robocall Mitigation Database (RMD).

1.2 Scope

This policy applies to all customers utilizing the RingTrio contact center software platform, including all outbound voice traffic originated by customers through the platform, and any inbound traffic subject to mitigation efforts. It also applies to all RingTrio personnel involved in the provision, management, and monitoring of the platform and associated services.

2.0 Regulatory Framework

RingTrio, LLC operates within a stringent regulatory environment designed to protect consumers from unwanted and fraudulent calls. The primary federal legal framework includes:

- **The Telephone Consumer Protection Act (TCPA) of 1991:** While predating recent robocall surges, the TCPA established restrictions on the use of automatic telephone dialing systems (ATDS) and artificial or prerecorded voices, and created the National Do Not Call Registry.
- **The Truth in Caller ID Act:** Prohibits the transmission of misleading or inaccurate caller ID information with the intent to defraud, cause harm, or wrongly obtain anything of value.
- **The TRACED Act of 2019:** Mandated the implementation of STIR/SHAKEN caller ID authentication technology, required voice service providers to implement robocall mitigation programs, and facilitated enforcement against illegal robocallers.
- **Federal Communications Commission (FCC) Regulations:** The FCC has issued numerous rules and orders implementing the TRACED Act and other statutes, including specific requirements for STIR/SHAKEN deployment, robocall mitigation programs, and the mandatory filing in the Robocall Mitigation Database. Relevant FCC rules are codified primarily in 47 CFR § 64.1200 et seq. (TCPA) and 47 CFR § 64.6300 et seq. (Caller ID Authentication and Robocall Mitigation).

Under these regulations, voice service providers like RingTrio (acting as the direct provider to the customer) have specific obligations regarding the authentication of caller ID information and the implementation of reasonable steps to avoid carrying illegal robocall traffic. Failure to comply



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can result in significant penalties, including fines and the potential for other providers to block non-compliant traffic.

3.0 RingTrio's Robocall Mitigation Program

RingTrio, LLC is committed to implementing and maintaining a robust robocall mitigation program designed to prevent illegal robocall traffic from originating on or traversing our network. This program leverages the capabilities of the underlying Skyswitch platform and incorporates additional measures managed by RingTrio. Our program includes, but is not limited to, the following components:

3.1 STIR/SHAKEN Implementation

RingTrio, LLC, as a voice, SMS/MMS, email, and web chat service provider originating calls on behalf of our customers, has implemented the STIR/SHAKEN framework to authenticate and verify caller ID information for calls traversing IP networks, managed by Skyswitch. This technology cryptographically signs the caller ID information, allowing downstream providers to verify the authenticity of the calling number.

Procedure 3.1.1: Outbound Call Attestation

1. When a customer originates an outbound call via the RingTrio platform, the platform (powered by Skyswitch technology) processes the call setup information.
2. RingTrio's network (Skyswitch partner carrier(s)) applies the appropriate STIR/SHAKEN attestation level (Full 'A', Partial 'B', or Gateway 'C') based on our knowledge of the customer and their right to use the originating number.
3. The signed call information is transmitted to the next provider in the call path.
4. RingTrio continuously monitors industry best practices and regulatory guidance to ensure our STIR/SHAKEN implementation remains compliant and effective.

3.2 Traffic Monitoring and Analysis

RingTrio employs sophisticated traffic monitoring (powered by Skyswitch technology) and analysis tools to identify patterns indicative of potential illegal robocalling activity. This includes analyzing call volume, duration, completion ratios, sequential dialing, and complaint data.

Procedure 3.2.1: Automated Traffic Analysis

1. The RingTrio platform continuously collects metadata for all call traffic.
2. Automated systems analyze this data in near real-time for suspicious patterns (e.g., unusually high call volumes from a single source, short duration calls followed by immediate redialing, sudden spikes in traffic).



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3. Alerts are generated for traffic flows that exceed predefined thresholds or exhibit characteristics commonly associated with illegal robocalling.

Procedure 3.2.2: Manual Review of Alerts

1. RingTrio manually reviews flagged traffic patterns, examining call details, customer information, and historical activity.
2. Based on the review, traffic may be escalated for further investigation or action, including potential blocking.

3.3 Complaint Handling and Investigation

RingTrio takes all reports of illegal robocalling or spoofing originating from our network seriously. We have established procedures for receiving, investigating, and responding to complaints from consumers, law enforcement, the FCC, and other voice service providers.

Procedure 3.3.1: Receiving Complaints

1. Complaints may be received via email (info@ringtrio.com), regulatory notices (e.g., from the FCC's Enforcement Bureau or other providers), or direct contact from consumers or law enforcement.
2. All complaints are logged in a central tracking system, including details such as the calling number, called number, date and time of the call, and a description of the issue.

Procedure 3.3.2: Investigating Complaints

1. Upon receiving a complaint, RingTrio initiates an investigation.
2. The investigation involves analyzing call logs to identify the origin of the call within the RingTrio platform (i.e., which customer originated the call).
3. Traffic patterns associated with the identified customer are reviewed for signs of non-compliant activity.
4. If necessary, the customer is contacted for information regarding the calls in question (See Procedure 4.2.1).
5. Information from the investigation is used to determine if a policy violation or illegal activity occurred.

Procedure 3.3.3: Responding to Complaints

1. RingTrio responds to complainants (regulatory bodies, law enforcement, or other providers) with the findings of the investigation and the actions taken.
2. Responses are provided within required timeframes (e.g., 24 hours for traceback requests from the FCC's traceback consortium).



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3.4 "Know Your Customer" (KYC) Procedures

While RingTrio is a white-label reseller, we implement reasonable KYC procedures during the customer onboarding process to assess potential risks.

Procedure 3.4.1: Customer Onboarding Vetting

1. During the sales and onboarding process, RingTrio collects necessary business information from prospective customers.
2. RingTrio may review publicly available information about the customer's business practices.
3. Customers are required to agree to RingTrio's Terms of Service and this Robocall Mitigation Policy, which explicitly prohibit illegal robocalling and spoofing.

3.5 Collaboration with Traceback Efforts

RingTrio cooperates fully with government and industry traceback efforts to identify the source of illegal robocalls.

Procedure 3.5.1: Responding to Traceback Requests

1. Upon receiving a traceback request (e.g., from the FCC-designated traceback consortium), RingTrio prioritizes the request.
2. RingTrio uses internal logs and platform capabilities to trace the call path back to the originating customer on the RingTrio platform.
3. The requested information is provided to the traceback consortium or requesting entity within the specified timeframe (typically 24-48 hours).

4.0 Customer Obligations and Liability

It is imperative that RingTrio customers understand their significant responsibilities and the fact that **ultimate and sole liability for compliance with all federal and state telecommunications laws and regulations, including those pertaining to robocalling, telemarketing, and caller ID, rests entirely with the customer.** RingTrio provides the platform; the customer controls how that platform is used and the content of the communications transmitted.

By using the RingTrio contact center software, customers agree to the following obligations:

4.1 Compliance with All Applicable Laws and Regulations



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Customers must comply with all federal and state laws and regulations governing their calling activities, including:

- The TCPA and its implementing regulations.
- The Telemarketing Sales Rule (TSR).
- The Truth in Caller ID Act.
- All state-specific telemarketing and robocall laws.
- Regulations requiring consent for autodialed or prerecorded calls.
- Rules regarding the use of the National Do Not Call Registry and internal do-not-call lists.
- Requirements for accurate caller ID information.

Procedure 4.1.1: Customer Legal Review

1. Customers must consult with their own legal counsel to understand the full scope of their obligations under applicable telecommunications and telemarketing laws.
2. Customers must establish internal compliance programs to ensure their calling campaigns adhere to these laws.

4.2 Prohibited Activities

Customers are strictly prohibited from using the RingTrio platform for any illegal, abusive, or fraudulent purposes, including but not limited to:

- Originating illegal robocalls (calls made using an ATDS or prerecorded/artificial voice without required consent).
- Transmitting misleading or inaccurate caller ID information (spoofing) with intent to defraud, cause harm, or wrongly obtain anything of value.
- Engaging in telemarketing calls in violation of the TCPA, TSR, or state laws.
- Making calls to numbers on the National Do Not Call Registry or their internal do-not-call lists in violation of applicable rules.
- Engaging in call campaigns designed to overwhelm or harass recipients.
- Utilizing war dialing or similar practices to indiscriminately dial phone numbers.

Procedure 4.2.1: Customer Response to RingTrio Inquiry

1. If RingTrio receives complaints or identifies suspicious traffic patterns associated with a customer, RingTrio may contact the customer for information.
2. Customers must respond truthfully and completely to all inquiries from RingTrio regarding their calling practices within the requested timeframe (typically 24-48 hours) - no later than 80 hours.
3. Customers must provide evidence of compliance, such as proof of consent or their internal do-not-call list procedures, upon request.



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4.3 Accurate Caller ID Information

Customers must ensure that the caller ID information they transmit is accurate and does not mislead recipients.

Procedure 4.3.1: Configuring Caller ID

1. Customers must configure their outbound caller ID within the RingTrio platform to display a valid, working telephone number that accurately identifies the caller.
2. The displayed name (CNAM) should also accurately reflect the identity of the calling entity.
3. Customers must ensure that the displayed number allows consumers to call back to opt out of future calls or receive more information.
4. If utilizing call masking/call spoofing, customer must provide proof of acknowledgement by the party allowing use of their CNAM/CNAME.

4.4 Cooperation with Investigations

Customers must cooperate fully with RingTrio, law enforcement, and regulatory agencies in any investigation into illegal calling activity potentially originating from their account.

Procedure 4.4.1: Customer Cooperation with Traceback/Investigations

1. If RingTrio is subject to a traceback request or regulatory inquiry related to a customer's traffic, the customer must provide all requested information and documentation promptly to RingTrio or directly to the investigating authority as directed.
2. This includes providing details about calling campaigns, lists used, consent collection methods, and internal compliance procedures.

4.5 Liability for Non-Compliance

Customers acknowledge and agree that they are solely liable for any and all damages, fines, penalties, judgments, and costs arising from their non-compliant use of the RingTrio platform, including violations of the TCPA, Truth in Caller ID Act, TRACED Act, FCC regulations, state laws, or any other applicable telecommunications laws.

Procedure 4.5.1: Customer Assumption of Liability

1. By signing the RingTrio Terms of Service and utilizing the platform, the customer explicitly assumes all liability for their outbound calling activities.
2. Customers agree to indemnify, defend, and hold harmless RingTrio, LLC, Skyswitch (as the underlying technology provider), and their respective officers, directors, employees, and agents from any and all claims, losses, liabilities, damages, fines, penalties, costs,



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and expenses (including reasonable attorneys' fees) arising from or relating to the customer's non-compliant use of the service.

5.0 RingTrio's Internal Procedures

Beyond the automated and complaint-driven processes, RingTrio maintains internal procedures to manage our robocall mitigation program and ensure ongoing compliance, including fulfilling our FCC filing obligations.

5.1 Robocall Mitigation Program Management

Procedure 5.1.1: Program Oversight

1. A designated compliance officer or team within RingTrio is responsible for the overall management and effectiveness of the robocall mitigation program.
2. This team stays informed about regulatory developments, industry best practices, and emerging robocalling trends.

Procedure 5.1.2: Technology and Vendor Management

1. RingTrio works closely with Skyswitch to understand and utilize the robocall mitigation capabilities inherent in the white-label platform.
2. RingTrio evaluates and implements additional tools or services as necessary to enhance mitigation efforts.

5.2 FCC Robocall Mitigation Database Filing Procedures

RingTrio, LLC is required to file a certification in the FCC Robocall Mitigation Database (RMD) detailing our STIR/SHAKEN implementation and robocall mitigation program. This filing must be updated annually and within 30 days of any material change to our program. The process follows the instructions provided by the FCC (Version: April 2025).

Procedure 5.2.1: Maintaining CORES Account and FRN

1. RingTrio maintains an active business-type CORES account and associated FRN.
2. Contact information and business details in CORES are kept current.

6.0 Enforcement and Non-Compliance

RingTrio, LLC reserves the right to take immediate action against customers who violate this policy or use the platform for illegal or abusive calling activities. Such actions may be taken



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based on RingTrio's own monitoring, complaints received, traceback requests, or notification from regulatory agencies or law enforcement.

6.1 Actions for Non-Compliance

Procedure 6.1.1: Investigation and Warning

1. Upon identifying potential non-compliant activity, RingTrio will investigate (See Procedure 3.3.2).
2. If a violation is suspected, RingTrio may issue a formal warning to the customer, detailing the nature of the suspected violation and requiring corrective action within a specified timeframe.

Procedure 6.1.2: Traffic Blocking or Filtering

1. If a customer fails to cease non-compliant activity after a warning, or in cases of severe or repeated violations, RingTrio may, in its sole discretion, block or filter specific call traffic, calling numbers, or ranges of numbers associated with the customer's account.
2. Blocking may be implemented without prior notice in urgent situations involving suspected illegal activity causing immediate harm.

Procedure 6.1.3: Account Suspension or Termination

1. For persistent or egregious violations, or failure to cooperate with investigations, RingTrio may suspend or permanently terminate the customer's account and access to the RingTrio platform.
2. Account termination will be carried out in accordance with the terms of the customer's service agreement.

Procedure 6.1.4: Reporting to Authorities

1. RingTrio will cooperate with and may report confirmed illegal robocalling or spoofing activity to relevant law enforcement agencies, the FCC, the Federal Trade Commission (FTC), and the traceback consortium.
2. Customer information associated with illegal activity may be shared with these entities in accordance with applicable laws and regulations.

6.2 Customer Recourse

Customers who believe action has been taken against their account in error may contact RingTrio support to dispute the action. However, RingTrio's determination regarding violations of this policy and the necessity of mitigation actions shall be final and binding.



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Procedure 6.2.1: Disputing Mitigation Action

1. Customers must submit a written dispute to RingTrio support, providing detailed reasons why they believe the action was taken in error and any supporting documentation.
2. RingTrio will review the dispute and the evidence of the alleged violation.
3. RingTrio will communicate its final determination to the customer.

7.0 Record Keeping

RingTrio maintains records necessary to demonstrate compliance with this policy and regulatory requirements.

Procedure 7.0.1: Maintaining Call Records

1. RingTrio (powered by Skyswitch) retains detailed records of call traffic, including originating and terminating numbers, timestamps, duration, and routing information, for a period consistent with regulatory requirements and business needs.

Procedure 7.0.2: Maintaining Compliance Records

1. RingTrio maintains records of:
 - Robocall mitigation program documentation.
 - FCC RMD filings and submission confirmations.
 - Complaints received and their resolution.
 - Investigations conducted.
 - Actions taken against customer accounts (warnings, blocking, suspension, termination).
 - Traceback requests received and responses provided.

8.0 Policy Review and Updates

This policy is subject to periodic review and may be updated by RingTrio, LLC at any time to reflect changes in laws, regulations, technology, or business practices.

Procedure 8.0.1: Periodic Review

1. RingTrio's will review this policy at least annually.
2. The review will assess the effectiveness of the mitigation program and identify areas for improvement.

Procedure 8.0.2: Policy Updates and Notification



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1. Updates to this policy will be approved by RingTrio management.
2. Customers will be notified of significant policy changes through appropriate channels, such as email notification or prominent posting on the RingTrio website or platform portal.
3. Continued use of the RingTrio platform after notification of policy updates constitutes acceptance of the revised policy.

By implementing and enforcing this Robocall Mitigation Policy and Procedures, RingTrio, LLC demonstrates its unwavering commitment to combating illegal robocalling and protecting the integrity of telecommunications for the benefit of our customers and the public. We expect and require full cooperation and adherence from all users of the RingTrio platform.