

Robocall Mitigation Plan

Rocky Mountain Computer Solutions d/b/a RMCS

RMCS is an interconnected VoIP provider offering hosted PBX and SIP trunking to enterprises of all sizes. Our customers are exclusively business end-users; we do not offer services to other telephone service providers or individuals. Our customers interconnect with us over the public internet using their own broadband service.

1. **KNOW YOUR CUSTOMER:** Each RMCS customer must provide a physical business address, business registration, and name and contact info for at least one responsible individual. The business must have a web presence and contact email must be a domain dedicated to the business. The business must be registered in a US state or territory, no foreign entities allowed. Payment must be made via credit card, US bank transfer, or US bank check. We cross-check and verify all these items and refuse to serve customers that are in any way suspicious. We do not serve foreign customers.
2. **RATE LIMITS:** All callers are limited in the number of outbound calls they can initiate per minute and the number of concurrent calls allowed. These limits are set on a customer-by-customer basis based on conversational expectations given their business profile. A medium-sized business with 50 employees would be allowed 20 simultaneous calls and would be able to initiate 10 calls per minute.
3. **CALLER ID:** We provide our customers with their telephone numbers (DIDs); customers can port their numbers to RMCS if they choose. All outbound calls must use a Caller-ID from that customer's pool of numbers assigned by us. The only exception is forwarded calls; in these cases, the call must include a DIVERSION header that contains a number assigned to that customer by RMCS. These conditions are checked by our switch before the call is sent onward.
4. **CDR MONITORING:** RMCS assesses each customer's traffic on a monthly basis. We examine a set of metrics (number of call attempts, answer seizure ratio, average call duration, fraction of calls shorter than 60 seconds), looking for: (a) signs of automated dialing; (b) significant change from that customer's historic usage. Any anomalies result in immediate engagement with the customer to obtain a thorough, definitive explanation. If not resolved within 7 business days, the customer's service is suspended.

5. TRACEBACK: RMCS has never received a traceback request; however we will respond promptly to any future traceback requests. Any traceback results in an immediate detailed analysis of the initiating customer's CDRs for the past 30 days, followed by engagement with the customer to explain anomalies in the CDRs as well as the specific traceback example. If we do not receive satisfactory explanation within 72 hours, the customer would be suspended. A customer that is the subject of three tracebacks in 90 days is permanently banned from our platform, unless the traceback examples are shown with certainty to be legal and compliant.
6. EXTENSION: RMCS is subject to a STIR/SHAKEN implementation extension. RMCS does not have direct access to numbering resources; we get our numbers via another wholesale provider. In addition we have fewer than 100,000 customers.