

Rivercity Technology Services Ltd. Robocall Mitigation Program

Rivercity Technology Services Ltd. is a non-facilities-based reseller of voice over Internet Protocol (VoIP) service. Our wholesale network provider is PayG, LLC dba Skyswitch. This Robocall Mitigation Plan describes the specific reasonable steps that Rivercity Technology Services has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our wholesale provider's network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Rivercity Technology Services has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Rivercity Technology Services vets the identity of all new and renewing end-user customers, which are all business customers. In particular, we collect information such as their physical business location, contact person(s), and the general nature of their business. Rivercity Technology Services has never received a request for high-volume origination services, but were we to receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service.

Rivercity Technology Services has enforceable terms and conditions for the use of its services that define the circumstances by which we will deny, suspend, or terminate service to a customer. Likewise, our contracts with business customers typically contain provisions that allow termination in the instance that services are being abused. Rivercity Technology Services would not hesitate to suspend or terminate service to a customer that we discovered was using, or attempting to use, our services to originate illegal calls.

In addition, the Terms of Service agreement between PayG, LLC dba Skyswitch and Rivercity Technology Services contains acceptable use and traffic integrity terms that prohibit the use of Skyswitch's services for illegal robocalling. Consequently, were Skyswitch to find that an end-user customer of Rivercity Technology Services was originating illegal calls, Skyswitch could require the suspension or termination of the customer's service.

"Know-Your-Upstream Provider" Procedures

Rivercity Technology Services relies upon the "Know-Your-Upstream Provider" procedures of its wholesale provider, PayG, LLC dba Skyswitch. Rivercity Technology Services is confident that Skyswitch exercises due diligence prior to accepting traffic from an upstream provider.

Use of Call Analytics Systems

Rivercity Technology Services' wholesale network provider, PayG, LLC dba Skyswitch, utilizes internal data analytics to monitor its network for irregular and unexpected traffic patterns that appear abusive. If Skyswitch identified a suspicious traffic pattern originating from a Rivercity Technology Services end-user customer, Skyswitch would contact us, and together we would determine a course of action to promptly investigate the matter and address any illegal calling that was occurring. Also, Skyswitch has the ability to limit any end-user customer's calling capacity via call per second and/or concurrent session limits.

In addition, Skyswitch uses proprietary call analytics systems and processes to identify and block illegal robocall traffic bound for Rivercity Technology Services' end-user customers. By default, Skyswitch blocks calls purporting to originate from numbers on a reasonable do-not-originate (DNO) list.

Commitment to Respond to Traceback Requests

Rivercity Technology Services commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its services to originate, carry, or process illegal robocalls.