

Ringflow LLC Robocall Mitigation Program

Pursuant to the rules of the Federal Communications Commission, including 47 CFR Section 64.6305 (*Robocall Mitigation and Certification*), Ringflow LLC has implemented the following Robocall Mitigation Program:

Preventing Illegal Traffic

Ringflow LLC is committed to compliance with the Telephone Customer Protection Act (TCPA), the TRACED Act (*Telephone Robocall Abuse Criminal Enforcement and Deterrence*) and the rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, Ringflow LLC requires each customer to provide information that enables Ringflow LLC to “know its customers” and properly conduct the necessary due diligence to comply with the law and protect its network.

Due Diligence

Ringflow LLC conducts due diligence with respect to each customer, both those existing prior to the date of this Robocall Mitigation Program and new customers, that is designed to ensure the customer will not originate illegal robocall traffic, or other illegal traffic, by:

- The proper formation and good standing of the customer entity, including whether it is foreign or domestic and review of the customer’s website and mainstream social media accounts
- A description of the customer’s business, including whether the customer uses any auto-dialing technology
- Obtaining the customer’s current and prior IP addresses for review, including whether they are foreign and checking for any litigation pertaining to the customer or its principals.

Wholesale Customers

Ringflow LLC will only accept traffic for termination from carrier customers (if any) that have an active registration in the Robocall Mitigation Database. Ringflow LLC will review the customer’s Robocall Mitigation Program on file with the FCC. For any wholesale customers, Ringflow LLC also investigates:

- Whether the customer has been determined by US Telecom’s Industry Traceback Group to be a “*Non-Cooperative Voice Service Provider*”, customer has been blocked from another voice service provider’s and determined to be a “*bad-actor upstream voice service provider*”
- Whether the customer is registered with the Universal Service Administrative

- Company and has obtained a Form 499 Filer ID, has implemented the STIR/SHAKEN Authentication Framework
- A description and sample recording or transcript (in English) of the proposed autodialed calls
- A list of the proposed ANIs to be autodialed
- The proposed calls per second for the relevant autodialed call campaign

Traceback Requests

Ringflow LLC commits to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.

STIR/SHAKEN Implementation

Ringflow LLC will maintain full implementation of the STIR/SHAKEN framework and assign attestation levels on all calls from its network intended for termination into the United States, in accordance with industry best practices.

Call Blocking and Analytics

Ringflow LLC will block services to a customer if it determines that the customer is using the services for illegal robocalling.

Ringflow LLC uses no internal analytic systems, software or third-party vendors at this time to identify and block illegal robocall traffic. Its wholesale provider may employ such systems.