

FCC Robocall Mitigation Program Description

Filing Entity: Renegade Commons LLC

1. Program Overview and Purpose

This document serves as the Robocall Mitigation Program description for Renegade Commons. While the company is not currently offering live call termination or origination services, we are establishing this program to ensure full compliance with the Federal Communications Commission's (FCC) rules and to be prepared for the future launch of our service.

Our program is built on a framework of proactive client vetting, network monitoring, and full cooperation with law enforcement and industry traceback efforts to prevent the origination of illegal robocalls. The program is designed to evolve and scale with our service offerings, with core principles already in place to guarantee a secure environment for all calls, even during our pre-launch phase.

2. Client Vetting and Know Your Customer (KYC)

Renegade Commons is committed to the FCC's requirement for voice service providers to take "affirmative, effective measures" to prevent customers from originating illegal calls. Given our restricted client base, we are uniquely positioned to implement a rigorous vetting process.

Client Eligibility: Renegade Commons will provide services exclusively to registered political parties, candidates for public office, and Political Action Committees (PACs). This limited scope inherently reduces the risk of onboarding bad actors.

Verification and Due Diligence: Upon onboarding, each client will be subjected to a comprehensive verification process. This will include validating their status with relevant federal or state election commissions, authenticating the identity of authorized representatives, and reviewing their intended calling campaigns.

Contractual Obligations: All client service agreements will contain explicit provisions prohibiting the use of our platform for any illegal robocall activity. This includes mandates to comply with the Telephone Consumer Protection Act (TCPA), specifically regarding prior consent for calls to mobile numbers, and accurate caller ID presentation.

3. Traceback and Law Enforcement Cooperation

Renegade Commons will fully cooperate with the FCC, law enforcement agencies, and the industry traceback consortium in investigating and stopping illegal robocalls.

24-Hour Response Commitment: In accordance with FCC rules that require voice service providers to respond to traceback requests , Renegade Commons establishes a mandatory policy to respond fully to any traceback request within 24 hours of receipt.

Point of Contact: We will designate a primary point of contact responsible for handling traceback requests and other robocall mitigation inquiries. This contact will be empowered to access call records, client information, and system logs to facilitate rapid investigations.

Full Cooperation: Upon receiving a valid traceback request, we will promptly provide all relevant records and information to assist in identifying the source and nature of the traffic in question .

4. Plan to Identify Unauthorized Use

Even with robust vetting, Renegade Commons recognizes the need to detect and prevent unauthorized use or system compromise.

Call Analytics Systems: We will implement and maintain a system to analyze call traffic. This will involve monitoring for suspicious patterns such as high call volumes to unassigned numbers, extremely short call durations (which may indicate predictive dialing), or unusual geographic routing. This system is part of the "reasonable steps" required to avoid originating illegal traffic .

Anomaly Detection and Blocking: The analytics system will be configured to flag anomalies for manual review by our compliance team. If illegal or unauthorized traffic is identified, we will take immediate steps to block it and, if necessary, suspend the offending client's access to our platform pending a full investigation.

Internal Audits: We will conduct regular audits of client accounts and traffic patterns to ensure compliance and to proactively identify any potential security breaches or unauthorized use of our system.

5. Certification and Compliance

Annual Recertification: Renegade Commons will maintain the accuracy of its RMD filing and will update it and recertify annually or within 10 days of any material change in the information provided .

STIR/SHAKEN Readiness:

- a. While we are not currently live, our technical roadmap includes full preparation for STIR/SHAKEN implementation on all IP-based portions of our network to ensure calls are authenticated and verified to prevent spoofing.
- b. We intend to work with SIP Trunk providers Telnyx and BulkVS which both handle full STIR/SHAKEN implementation out of the box.

6. Number Provisioning and Inventory Control

Renegade Commons maintains complete and exclusive control over all telephone numbers provisioned for use on our platform. Clients will not have the ability to self-provision, port-in, or manage number inventories independently.

Centralized Provisioning: All numbers used for voice calls or SMS services originating from our platform will be procured, assigned, and provisioned solely by Renegade Commons administrative personnel. Clients will have no direct access to number provisioning interfaces or administrative controls.

Legal and Valid Number Verification: Prior to provisioning any number for client use, we will take affirmative steps to verify the legality and validity of that number at the time of assignment. This includes: Confirming that the number is not listed on any federal or state Do-Not-Call registries or robocall complaint databases. Validating that the number is properly registered with the relevant numbering authority and is not misappropriated, stolen, or associated with prior illegal activity. Ensuring that the number is not a "high-risk" or previously flagged number based on industry reputation databases.

Ongoing Validation: We will conduct periodic sweeps of our active number inventory to re-verify the status and legitimacy of provisioned numbers, removing any that become invalid, reassigned, or flagged for suspicious activity.

Inventory Auditing: Comprehensive logs will be maintained for all number provisioning, assignment, and decommissioning activities to ensure full traceability and accountability.