

Robocall Mitigation Plan

Ring Ring Club, LLC

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1. Overview of the service

Ring Ring Club, LLC ("Ring Ring Club") is a consumer interconnected VoIP provider offering a screen-free home phone service designed for children. The service is sold to parents, who administer it on their child's behalf. It is a closed, invitation-controlled calling service rather than an open telephone offering: every line is provisioned to an individual household, and calling is restricted to contacts that a parent has explicitly approved.

Ring Ring Club does not offer wholesale origination, does not resell origination capacity to other carriers or resellers, and does not provide any mechanism for a third party to send traffic through its network. All voice traffic on the network originates from, or terminates to, an identified end-user household under a parent-administered account. Ring Ring Club obtains its underlying telecommunications and numbering resources from Twilio Inc., a facilities-based provider, and relies on Twilio's network infrastructure for call origination, termination, and caller-ID authentication.

2. STIR/SHAKEN caller-ID authentication status

Ring Ring Club originates all outbound voice traffic through Twilio Inc., a facilities-based provider that implements the STIR/SHAKEN caller-ID authentication framework in the IP portion of its network. Ring Ring Club does not operate independent call-authentication infrastructure and does not hold its own Service Provider Code (SPC) token or STI-CA certificate; authentication of Ring Ring Club traffic is performed by Twilio under Twilio's certificate.

Ring Ring Club's telephone numbers are enrolled in Twilio's Trust Hub under a Twilio-approved Business Profile with an approved SHAKEN/STIR registration. Outbound calls from eligible United States numbers assigned to that approved Business Profile are signed with A-level (full) attestation, reflecting that Ring Ring Club has a direct authenticated relationship with the subscriber and itself assigned the telephone number to that subscriber. As of August 3, 2026, all 142 eligible United States numbers on Ring Ring Club's account are so assigned. Ring Ring Club's two remaining numbers are non-US and fall outside the United States STIR/SHAKEN framework.

Because caller-ID authentication of Ring Ring Club's traffic is performed by its upstream provider under that provider's certificate rather than by infrastructure Ring Ring Club operates itself, Ring Ring Club also maintains and describes below the robocall mitigation practices it applies across its network.

3. Robocall mitigation practices

Independent of STIR/SHAKEN, the design of the service itself provides robocall mitigation that is materially stronger than a conventional consumer voice offering. Ring Ring Club has taken the following reasonable steps to avoid originating illegal robocall traffic on its network.

Closed, allowlist-gated network. Each Ring Ring Club line can place and receive calls only to and from contacts that the account's parent administrator has explicitly approved. Numbers not on the approved list cannot connect in either direction. The network is therefore structurally incapable of serving as a destination for, or a conduit of, unsolicited mass calling.

No third-party or wholesale origination. Ring Ring Club does not sell, lease, or otherwise make available origination capacity to any other carrier, reseller, or customer. There is no mechanism by which an outside party could inject traffic into the network. All originating traffic is attributable to a known, parent-administered household account.

Human-scale, non-automated outbound calling. Outbound calls are placed manually by individual child users to a small set of pre-approved contacts. The service provides no autodialing, broadcast, campaign, or programmatic mass-calling capability to end users, and outbound call volumes per line are low and consistent with ordinary personal use.

Know-your-customer. Every account is established by a paying parent through a verified sign-up and payment relationship processed by Stripe, so each originating line is tied to an identified, billed account holder rather than an anonymous user.

Traceback cooperation. Ring Ring Club will respond to and cooperate with traceback requests from the Industry Traceback Group and with lawful requests from the Commission and law enforcement, and will investigate and act on any notification that its network has been used to originate illegal traffic, including by suspending or terminating any offending account.

Monitoring and response. Because the network is closed and low-volume, anomalous calling patterns are readily identifiable. Ring Ring Club monitors for unusual outbound activity and will take prompt action, up to and including account suspension, on any indication of misuse.

4. Robocall mitigation point of contact

Ring Ring Club's point of contact for robocall mitigation and traceback matters is its support team, reachable at support@ringringclub.com. This is a monitored channel that generates a tracked record of each request and is not dependent on the availability of any single individual.

5. Certification

Ring Ring Club, LLC certifies that the foregoing accurately describes its caller-ID authentication status and the reasonable steps it has taken to avoid originating illegal robocall traffic on its network.