

# Robocall Mitigation Compliance

## Acceptable Use Policy Supplement

*Effective Date: June 30<sup>th</sup>, 2021*

Reinvent Telecom has created this Robocall Mitigation Compliance policy for Partners and Users of our Network, Products and Services to outline expectations for adhering to FCC requirements and applying industry best practices to improve communication confidence. These expectations are an extension of the Reinvent Telecom Acceptable Use Policy and are subject to the monitoring and enforcement guidelines outlined within the AUP.

Reinvent Telecom reserves the right to modify these expectations at any time and in its sole discretion pursuant to the relevant Reinvent Telecom terms of service (“Service Terms”). Any use of Reinvent Telecom Products and Services after such modification constitutes acceptance as revised.

### Know Your Customer

All wholesale partners of Reinvent Telecom must institute the best practices outlined in the FCC site/document linked below to help identify potential nefarious users before they are turned up on the Reinvent Telecom Network and/or are utilizing its Products and Services.

<https://www.fcc.gov/call-authentication>

<https://www.fcc.gov/document/fcc-issues-caller-id-authentication-best-practices>

### Traceback Request Support

All wholesale partners of Reinvent Telecom must quickly comply to any traceback request from US Telecom’s Industry Traceback Group or the FCC. Failure to do so within the required timeframe or to the full extent outlined in the request could result in Reinvent Telecom to take necessary steps to stop the traffic in question, which may include suspension of the suspected traffic.

### Number Validation

All wholesale partners of Reinvent Telecom must make sure that all voice calling traffic contains good/valid telephone numbers in the ANI/FROM fields. Outlined below are the definitions of the various types of ANI/FROM fields. It is the responsibility of all wholesale partners of Reinvent Telecom to ensure that:

- (i) all calls meet the following “VALID” criteria, and
- (ii) all calls never have ANI/FROM phone numbers that fall into the UNALLOCATED, INVALID, N11, Alpha or Empty ANI categories.

If any calls placed using the Reinvent Telecom Network, its Products or its Services, do not meet these criteria, they have the potential risk of being BLOCKED.

## Types of ANI/FROM Fields

- **VALID:** A valid NPA-NXX-XXXX in the NANP
- **UNALLOCATED:** A valid NPA NXX XXXX in the NANP, but NOT assigned either to a carrier or in the LERG
- **INVALID NUMBER:** A complete telephone number (TN) that is NOT VALID, but of the correct format [2-9][0-9][0-9] [2-9][0-9][0-9] [0-9][0-9][0-9][0-9] (i.e. 10 digits in length, 1st and 4th are [2-9] all others are [0-9])
- **INVALID DIGITS:** The calling party number is numeric, but doesn't fit into a category defined above (all 1's, partial entry <10 digits, etc.)
- **8YY:** The calling party number is an 8YY number
- **911:** The calling party number is 911
- **411:** The calling party number is 411
- **N11:** The calling party number is any of N11 number besides 911 or 411
- **555:** The NXX is 555
- **ALPHA:** The calling party number has 'alpha' characters that are random or the word ANONYMOUS in it
- **EMPTY:** There's no calling party number present

## Short Duration Calls

All wholesale partners of Reinvent Telecom should review user use cases for short duration calling (<15 seconds) and discourage the use of this practice. Short duration calls raise flags on most service provider networks and could lead to calls being BLOCKED per FCC guidelines.

## Unlawful Calling

All wholesale partners of Reinvent Telecom must take measures to detect, mitigate and educate users to cease sending calls that are considered unlawful per the FCC rules linked below.

<https://www.fcc.gov/document/fcc-adopts-rules-help-block-illegal-robocalls-0>

## Additional Documentation

### FCC Ruling Affirmation

<https://www.fcc.gov/document/fcc-affirms-robocall-blocking-default-protect-consumers-0>