



Magic Apple Technology, LLC

magicapple.com

615-425-7474

Magic Apple Technology, LLC Robocall Mitigation Plan

Robocall Mitigation Database Contact Information

Company Name	Magic Apple Technology, LLC
OCN	747J (IPES)
Physical Address	3057 Millerton Way Thompson's Station, TN 37179
Mailing Address	PO Box 251 Thompson's Station, TN 37179
Contact Name	Jeremy Apple, CTO
Phone	615-988-8993
Email	support@magicapple.com Traceback request: traceback@magicapple.com

STIR/SHAKEN Implementation

Magic Apple Technology, LLC ("Magic Apple" or "Company") is an originating voice service provider serving business end-users. Magic Apple has fully implemented STIR/SHAKEN caller ID authentication on its network.

Magic Apple holds its own Service Provider Code (SPC) token and certificate issued by the STI Policy Administrator. We sign all outbound calls using TransNexus ClearIP, which provides real-time STIR/SHAKEN authentication. Every call originated from our platform includes our IPES OCN (747J) and our TransNexus certificate applied to the SIP header of the call.

We provide attestation levels as follows:

Full Attestation (A): Assigned when we have verified the customer's identity and confirmed their authorization to use the calling number.

Partial Attestation (B): Assigned when we have verified the customer's identity but cannot confirm their authorization to use the calling number.

Gateway Attestation (C): Assigned when we have not verified the customer's identity or their authorization to use the calling number.



Responding to Traceback Requests and Government Requests

Magic Apple is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the Industry Traceback Group (ITG), the Telephone Producer Traceback Group (TPTG), the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using the Company's service to carry or process illegal calls.

The Company maintains a dedicated email address (traceback@magicapple.com) specifically for traceback requests. All requests received at this address are handled at the highest priority due to the time-sensitive nature of traceback investigations.

When notified by the FCC's Enforcement Bureau, the Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless the Company's investigation determines that the traffic is not illegal) when the Company receives actual written notice of such traffic from the Enforcement Bureau. If the Company determines that the identified traffic is not illegal, the Company shall provide the Enforcement Bureau with an explanation as to why the Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

Traceback Contact Information

Name	Title	Contact Information
Jeremy Apple	CTO	Phone: 615-988-8993 Email: traceback@magicapple.com
Matt Lloyd	CEO	Phone: 615-988-8992 Email: traceback@magicapple.com

Know Your Customer

Magic Apple is a business-to-business voice service provider. We do not provide service to residential customers or wholesale service to other carriers. All of our customers are businesses that we serve directly.



Customer Onboarding and Verification

When the Company commences operations with a new customer, we verify all new customers through a comprehensive vetting process that includes:

Letter of Authorization (LOA): We collect a signed Letter of Authorization from all customers during onboarding. This LOA authorizes Magic Apple to provide voice services and confirms the customer's identity and authority to act on behalf of the business.

Business Verification: We verify that the customer is a legitimate business entity through a combination of electronic and manual verification systems, review of business documentation, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees.

Number Verification: Before porting telephone numbers, we verify ownership of those numbers with the customer's current provider. This confirms the customer has legitimate rights to use the numbers they are bringing to our service.

Enforcement Review: We review FCC enforcement actions and publicly available information to determine whether prospective customers are subject to any restrictions on their calling activities, such as telemarketing bans or consent decree requirements.

The Company severely limits the capabilities of new accounts until these verification processes are complete. We use the information gathered through our vetting process to support the attestation level we assign to calls originated by each customer. Customers who have been fully vetted and whose number assignments have been verified receive Full Attestation (A) on their outbound calls.

Ongoing Monitoring

The Company utilizes data systems for analytics and reviews to identify illegal robocalling, including:

- Monitoring the network to identify suspicious traffic patterns
- Limiting customers' capacity via call per second and/or concurrent session limits
- Regularly checking call patterns for possible abusive traffic

Contractual Provisions and Enforcement

Our contractual provisions with customers prohibit them from initiating illegal robocalls or engaging in caller ID spoofing for fraudulent purposes. If we identify a customer initiating suspicious robocall traffic, we issue a warning requiring them to cease such activity. If the suspicious traffic continues, we terminate their service.



Underlying Carriers

Magic Apple utilizes the following underlying carriers for voice services. All carriers maintain active certifications in the Robocall Mitigation Database. We verify the RMD status of our carriers and ensure that each carrier we use for voice traffic has an active and compliant filing.

Carrier	Address	Contact
Bandwidth Inc.	2230 Bandmate Way Raleigh, NC 27607	(800) 808-5150 www.bandwidth.com
Inteliquent, Inc.	1 North Wacker Drive Suite 2500 Chicago, IL 60606	(866) 388-7258 www.inteliquent.com
Peerless Network, LLC	433 W. Van Buren Street Suite 410S Chicago, IL 60607	(312) 506-0920 www.peerlessnetwork.com
Bulk Solutions, LLC (BulkVS)	1201 N Orange Street Suite 7125 Wilmington, DE 19801	(855) 906-0901 www.bulkvs.com
Commio	5420 Wade Park Blvd Suite 100 Raleigh, NC 27607	(919) 890-0000 www.commio.com

Robocall Mitigation Program & Call Authentication Program

Magic Apple utilizes TransNexus ClearIP to authenticate and monitor all outbound voice traffic in real-time. Every call originated from our platform is signed with our own STIR/SHAKEN certificate, and our IPES OCN (747J) is applied to the SIP header of every outbound call.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes, and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.



The TransNexus ClearIP system provides the following monitoring and alerting capabilities:

- Monitoring of calling number reputation to identify numbers associated with robocall complaints
- Identification of invalid or unallocated calling numbers
- Detection of calls using numbers on the FCC's Do Not Originate (DNO) list
- Alerting on calling numbers appearing in the FCC consumer complaint database
- Detailed reporting to identify suspected illegal robocall traffic patterns

We immediately investigate any identified suspicious calls to determine if the customer was attempting to originate unlawful robocalls. If we determine that the traffic was likely unlawful, we warn the customer to stop sending such traffic. If they continue to send traffic that appears to be unlawful, we terminate their service.

Company Declaration

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change, designated Company representatives only will update this Robocall Mitigation Plan as appropriate.