



Microtalk USA Inc
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Robocall Mitigation Plan
Updated February 2026

Microtalk USA Inc ("Microtalk") is a voice service provider offering interconnected VoIP through its Unified Cloud platform. Microtalk offers services to end-user business customers and, as applicable, to wholesale/partner customers, e.g., reseller or business-to-business service arrangements. Outbound calls originate from end-user endpoints and/or partner-connected customer deployments provisioned or supported through the Microtalk's platform and are routed through its systems prior to handoff to upstream carrier partner(s) for PSTN interconnection/termination. Microtalk does not operate as an open transit provider for unaffiliated third-party traffic.

Microtalk remains committed to maintaining a robocall mitigation program consistent with 47 C.F.R. § 64.6305 and may modify, add, delete or otherwise alter any of the policies and procedures described in the plan within ten (10) business days when filing information, services, traffic patterns, or risk controls change.

STIR/SHAKEN

Microtalk certifies that it has fully implemented STIR/SHAKEN caller ID authentication across its IP network for the calls it originates, consistent with 47 CFR § 64.6301. Microtalk's network is IP-based for SIP calling, and Microtalk signs outbound calls it originates using its own STI certificate issued by an approved STI Certificate Authority (STI-CA).

Microtalk assigns attestation levels based on its verification of the calling party and confirmation of the calling party's authority to originate calls using the associated telephone number(s), consistent with applicable FCC rules, orders, and guidance.

All the voice traffic that originates on our network is subject to our caller-id whitelisting process. Should a customer intend on using a caller-id not purchased from Microtalk, said number must be verified before use. Calls with an unverified number will be dropped.

Know Your Customer

Microtalk uses affirmative measures to prevent customers from using its network to originate illegal calls, including knowing its customers and applying due diligence to deter illegal traffic.

At onboarding we may collect:

- Legal business name and DBA, if applicable

- EIN and/or formation documents
- Service address
- Authorized representative
- Contact details, including email and phone
- Payment method
- Number authority/control, as applicable
- Intended use case: industry, call purpose, target geography
- Expected traffic profile: anticipated volumes and calling patterns

Customers are validated using a risk-based review, e.g., public business records where applicable, consistency checks, and whether the requested services and stated use case are reasonable, before service is enabled.

Enhanced review may be triggered by unusually high projected volume, identity discrepancies, repeated caller ID changes, short-lived accounts, or indicators of lead-generation or robocall activity inconsistent with the stated use case. Additionally, Microtalk has Terms and Conditions (“T&C’s”) noted in its contracts. These T&C’s define the circumstances by which the company will deny, suspend, or terminate service to a customer.

Traffic Monitoring and Analytics

Microtalk screens outbound call traffic using its in-house switch and related controls to identify calling patterns consistent with illegal robocalls or abusive activity. Examples of indicators reviewed include burst calling, short-duration call concentration, unusually low answer or completion rates, repetitive and sequential dialing patterns, elevated unallocated destinations, and inconsistent or unauthorized caller ID behavior. Alerts and flagged activity are investigated by Microtalk’s support team, and Microtalk may take enforcement action up to and including warning, blocking/rate limiting, suspension, or termination of customers that breach our T&C’s or are suspected of illegal robocall activity.

Know Your Upstream Provider

Microtalk relies on upstream carrier partner(s) for PSTN interconnection, numbering, and call termination and maintains escalation contacts and procedures to coordinate on suspicious traffic, traceback requests, and enforcement actions. Where Microtalk supports wholesale and/or partner customers, we apply enhanced onboarding and ongoing monitoring for those accounts and enforce contractual restrictions against illegal robocalls, spoofing, and abusive calling activity.

Traceback

Microtalk has designated an individual as a dedicated point of contact for addressing traceback requests and remains committed to responding fully and within 24 hours to call traceback requests from the Commission, law enforcement, and the traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers initiating calls.

Point of Contact

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This program demonstrates Microtalk’s commitment to protecting consumers, upholding industry standards, and contributing to the elimination of illegal robocalls.