

Robocall Mitigation Plan 2026

I. Business Information

Name of Business: Proclaim VoIP LCC (“Proclaim” or “Company”)

Address of Business: 7336 W Post Rd STE 109; Las Vegas NV 89113

Description: Retail services to business customers (no wholesale or residential)

II. Contact Information

Contact Person: Donald Barrett Jr

Title: President

Address: 7336 W Post Rd STE 109; Las Vegas NV 89113

Telephone Number: 702.603.6110

Email Address: donnie@proclaimvoip.com

III. Know Your Customer

A. Goal is to identify initially Customers that may engage in the use of Robocalls. A “Robocall” means an illegal call using an auto-dialer with a random or sequential telephone number generator that delivers an initial prerecorded message or artificial voice that is placed either (i) for telemarketing purposes without the called party’s prior written consent, or (ii) to a wireless number for any purpose without prior express consent.

B. Customer Screening: From each Customer we require the following information which we maintain electronically in Company records gathered on a Company form:

- Physical location/address.
- Contact person.
- Place of incorporation (state or country).
- Federal tax ID number.
- Type of Customer’s account
(i.e., enterprise, call-center, small business)
- Nature of Customer’s business.
- Size of Customer’s business.
- Are auto-dialers used for any purpose? If so we do not board the customer.

- Call-Centers Customers must:
 - provide details about planned use of Company's services that clarify/confirm robocalls are not in use.
 - Provide written certification that they are not placing Robocalls.
- Foreign Customers must also:
 - State if they are using NANP numbers.
 - Provide the purpose of use of NANP numbers
 - Provide written certification that they are not placing Robocalls.

C. We updated existing Customer Information in January 2022 to obtain the same information obtained from new Customers after that date.

D. The Company's service agreements and contracts require Customers to comply with the Company's Acceptable Use Policy which prohibits Robocalls and allows Company to report suspicious activity when identified.

IV. Methods for Preventing Robocalls.

A. Assign Monitoring Levels.

- Assess information obtained pursuant to Sec. III.
- Verify all business entities and their proclaimed business purpose.
- Assign levels (Low to High) of monitoring based on information from Customer related to potential Robocall activity:
 - **Low** = Customer information suggests it is not likely a potential Robocall generator
 - **Medium** = Any U.S. based Customer whose info indicates it might be a potential Robocall generator
 - **High** = All Foreign Customers and any Customer where call monitoring has indicated potential Robocalling – High level status Customers must also provide written certification they are not generating Robocalls.

B. Customer Monitoring.

- Initial and monthly monitoring of all customers to validate Monitoring Level status.
- Validate **ANI/CallerID** against known Customer telephone numbers
- Validate Monthly total **ALOC > 45 secs**
- Customers that do not pass the above tests are then assigned the **High** monitoring status, which results in further Traffic Analytic reports that review possible Robocall indicators:
 - Check for **ASR < 50** (very low call completion rates)
 - Check for **SD > 10%** call behavior

- Check for current monthly **call volume > 25% increase** over prior month.
- When the Traffic Analytic reports indicate potential Robocalling appropriate responses will be taken, which include some or all of the following:
 - source traceback investigations;
 - Customer contacts about suspicious activity;
 - suspensions of Customers;
 - contact with relevant enforcement agencies.

C. Customer Contract Terms

- Advise Customers that they might be subject to random monitoring.
- All Customers must agree to cooperate in Traceback requests.
- When required, Customers must agree to provide certifications that they do not place Robocalls.

D. Customer Relations.

- Provide ANI/CallerID and Blocking capabilities allowing Customer block calls from individual numbers or at the network levels.
- Provide education and outreach to Customers about Robocall avoidance.
- Ensure there are no line item charges for Robocall mitigation on Customer bills.

V. Know Your Upstream Provider

Company has two industry leading upstream providers that we exclusively work with. We limit our upstream to these two providers for added security. Bandwith and Inteliquent are whitelisted with our STIR/SHAKEN mechanism to support authentication and signing of calls. Both upstream providers have additional layers of abuse monitoring in place. We get notified by their monitoring and compliance team if call volume has significant increases on a specific tenant.

VI. Call Analytics and Third Party Providers

- A. Company has contracted the services of TransNexus for the following services which are all fully implemented:
- STIR/SHAKEN authentication of inbound calls and signing of all outbound calls with the Proclaim certificate.
 - Enforcement of TransNexus curated do not originate (DNO) list to further filter abusive callers. All callers found on the DNO list are not routed, and the call is immediately dropped.
 - Full access to reports of all Proclaim call traffic on TransNexus portal. This is used to identify abusive users, or an account hacked by a bad player.

VII. Certifications

- A. Company has implemented the STIR/SHAKEN authentication framework in its internet Protocol networks pursuant to 47 C.F.R. § 64.6301 as of August 22, 2022.

- B. The traffic originated by the Customers of the Company is subject to the Robocall Mitigation Program contained herein.
- C. The Company is committed to respond to traceback requests and to cooperate with investigating authorities in their efforts to stop illegal Robocalls.

I, Donald Barrett Jr am an officer of Proclaim Voip LLC and have personal knowledge of the Company certifications contained herein and state, under penalty of perjury, that they are true and correct.

Dated this 11th of February 2026 at Las Vegas, Nevada.

A handwritten signature in black ink, appearing to read "Donald Barrett Jr.", with a stylized flourish at the end.

Donald Barrett Jr, President
For Proclaim VoIP LLC