

Robocall Mitigation Plan

TextNow, Inc. (Ontario)
TextNow Inc. (Delaware)

TextNow Inc., an Ontario corporation, and its affiliate TextNow Inc., a Delaware corporation (together “TextNow”) submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii).

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:

1. Terms of Use:

TextNow’s Terms of Use include terms indicating that customers should not use TextNow for the purpose of autodialing, robo dialing, robocalling, or any other automated calling or messaging, and that customers will not use third party software, applications, or systems to use or connect to TextNow for the purposes of attempting to automate calling or messaging. TextNow will suspend or terminate services for any customer that is found to have violated these terms.

2. Internal Systems:

TextNow uses a number of internal systems to detect and stop customers from originating illegal calls. These systems monitor signals such as: (1) the volume of calls made to any phone number; (2) the length of the phone calls; (3) the number of concurrent phone calls, and; (4) patterns in numbers dialed for sequential or algorithmic dialing. If we suspect a Terms of Use violation, we may limit the customer from originating new phone calls or sending new messages for a period of time. If we have confirmed a Terms of Use violation we will terminate the customer’s services.

3. Third-Party Tooling:

TextNow uses third party fraud tooling to programmatically identify and prevent bad actors from becoming customers and from accessing the platform. These tools span our user acquisition funnel, our registration and login flows, and core telecom flows, including call origination.

a. Adjust:

TextNow relies on Adjust’s fraud prevention suite to detect fraudulent customers, such as bots. The fraud attribution suite detects and rejects fraudulent engagements before attribution.

Description of Analytics to Block Illegal Traffic:

TextNow reviews and analyses different account markers to identify and block illegal traffic. These markers may include the following: (1) calling frequency; (2) terminating phone number; (3) messaging content, and (4) device and IP address identifiers.

TextNow also relies on third-party analytics to assist in preventing illegal robocalls. These tools cover different aspects of fraud management, including bot fingerprinting & identification; network traffic categorization and limiting; and calling traffic analysis.

1. Adaptive:

TextNow uses Adaptive to monitor incoming and outgoing messaging traffic. Adaptive primarily relies on regexes to determine if a message is violating our policies. Depending on the violation, customers may have their messages dropped/blocked, their account limited, or services terminated.

2. Human:

Human uses internal algorithms, rules, and policies to determine whether an account action may be taken by a bot. Customers may receive a captcha to prove that they are a person and if they believe an action may have been taken by a bot.

3. MaxMind:

MaxMind helps determine potential location and whether an IP address is linked to a home, VPN, or proxy. This information is used to help determine whether an account is fraudulent or not.

Know Your Customer Practices:

In the second quarter of 2026, TextNow updated its Know Your Customer (KYC) processes. Customers are scored at registration. Depending on the score received, a customer may be required to complete a liveness check or an identity verification before they can continue with account registration. An identity verification is successfully completed with a real, valid ID and accurate face match.

TextNow also requires identity verification for accounts that have been terminated or suspended services for suspected fraud or abuse. If the customer cannot or will not complete identity verification, the services remain terminated and the account is closed. If the customer successfully completes identity verification with a real, valid ID and accurate face match, and no fraud or abuse has been confirmed, then the account may be re-enabled.

Other Practices to Prevent Unlawful Calls:

TextNow has created internal tools and modeling to identify Terms of Use violations, including illegal traffic.

1. Internal Tools:

Our internal tooling performs analysis and assigns numeric scores to customer requests, behaviours, and workflows. These scores are then added together and the total score is used to determine what actions, if any, are required. Actions may include blocking a message, call, or other action, presenting a captcha, limiting an account, or terminating services.

2. Data Science Modeling

TextNow scores accounts based on metadata related to account activity and compares those scores to those of other accounts identified as “good” or “bad”. TextNow makes decisions to terminate or re-enable services manually as well as through some internal, automated disable jobs.

3. Rate Limiting

TextNow uses basic rate limiting on various sensitive routes to ensure that accounts are not being exploited by bots.

4. Internal Disable Jobs

TextNow has developed disable jobs to terminate services for accounts that have violated the Terms of Use or that we believe with high fidelity to be bad actor accounts. These disable jobs have been developed over a period of years and are regularly reviewed to ensure that false positive rates are below our acceptable thresholds.

Know Your Upstream Provider Practices:

TextNow has relationships with two upstream providers: 382 Communications and Sinch.

In anticipation of potentially engaging with additional providers in the future, in the third quarter of 2024 TextNow formalized policies to ensure that it does not exchange or accept fraudulent traffic. These methods include: 1. due diligence on provider selection; 2. contractual obligations; 3. ongoing monitoring; 4. incident response and resolution; 5. transparency and reporting; 6. alignment with industry standards.

1. Due Diligence on Provider Selection:

TextNow conducts evaluations of upstream providers before establishing partnerships. We assess their compliance with regulatory requirements, security practices, and ethical business conduct.

2. Contractual Obligations:

We incorporate detailed contractual agreements with our upstream providers to ensure adherence to applicable laws, including data protection regulations and anti-abuse measures.

3. Ongoing Monitoring:

TextNow performs regular audits and monitoring of upstream provider performance, ensuring their continued compliance with our standards and the evolving regulatory landscape.

4. Incident Response and Resolution:

We maintain clear escalation protocols with our upstream providers to address issues such as network abuse, fraud, or security breaches swiftly and effectively.

5. Transparency and Reporting:

Our practices prioritize transparency, and we work closely with upstream providers to ensure accurate reporting and data sharing that aligns with legal requirements.

6. Alignment with Industry Standards:

TextNow aligns its practices with industry standards to promote ethical and lawful communication.

Principals, Affiliates, Subsidiaries, and Parent Companies

Derek Ting	Lindsay Gibson	Kevin Denny
Nancy King	Naveen Gavini	Jochen Koedijk

DTing Limited Partnership	1487269 B.C. Unlimited Liability Company
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Commitment to Respond to Traceback Requests:

TextNow is willing and able to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

This Robocall Mitigation Plan describes the specific measures that TextNow has implemented as of February 26, 2024, with the exception of its formalized know-your-upstream-provider practices, which were adopted in the third quarter of 2024 in anticipation of potentially engaging additional upstream providers in the future, and updated KYC process which was adopted in June 2026. TextNow continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.