

TextMe, Incorporated Robocall Mitigation Plan

FRN 0023479991

OCN 745J

Filing date: February 27, 2026

275 Post St #400, San Francisco, CA 94108

As part of TextMe's submission to the FCC's Robocall Mitigation Database, TextMe is submitting this Robocall Mitigation Plan which documents our vigorous commitment to robocall mitigation.

INTRODUCTION

TextMe is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. TextMe originates calls on behalf of its end-users and terminates calls to its end-users. TextMe is a mobile application developer and a personal communication service provider. TextMe's apps provide users with a phone number for personal communication usage, including voice calls and text messages. Millions of consumers rely on TextMe for their personal communication needs on a monthly basis. We have a strong internal culture and operational focus of maintaining the integrity and quality of traffic running on our platform and are committed to incorporating robocalls mitigation techniques in all aspects of our operations, which we will describe in more detail below.

TextMe completed full implementation of the STIR/SHAKEN authentication framework across our entire network, and all calls we originate are compliant with § 64.6301(a)(1) and (2). TextMe made its first submission to the FCC's Robocall Mitigation Database certifying to complete STIR/SHAKEN implementation on June 22, 2021. TextMe has not had its prior certification removed by Commission action and has not been prohibited from filing in the Robocall Mitigation Database.

TextMe has never (including in the two years prior to the date of this filing) been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

TextMe's OCN is 745J.

TextMe's principals include Christophe Bach (Chairman & CEO), Patrice Giami (President), Frédéric Benqué (Co-Founder), Edouard Munck (Co-Founder) and Grégory Kokanosky (Co-Founder). TextMe does not have any other affiliates or parent companies. TextMe has two subsidiary entities which are not voice service providers.

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Other DBA names used by TextMe include FreeTone, TextMeUp, TextMe Labs, Text2Me.

TextMe is not a foreign voice service provider.

Robocall Mitigation Contact:

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Title: CFO

Department: Business Operations

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Telephone Number: +1-415-316-1206

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PHILOSOPHY

TextMe offers a consumer service and by nature our traffic is originated only by end users using our mobile applications. TextMe is fully dedicated and committed to preventing robocalls, abusive calls, and any illegal calls on its platform. TextMe maintains our telecom platform with the goal of only allowing high quality traffic. TextMe is fully committed to quick detection and suspension of any illegal traffic originating from and terminating to our network, if it does occur. TextMe's Terms and Conditions expressly prohibit illegal behavior, fraudulent behavior, and automated use - spam calling and automated calling are expressly prohibited. In the Terms and Conditions, TextMe also reserves the right to modify, block or terminate all or part of the services (with or without cause). All identified incidents of abuse are analyzed and used as a basis for further evolution of TextMe's traffic monitoring systems.

BEGIN CONFIDENTIAL

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TextMe commits to respond within 24 hours to all traceback requests from the FCC, 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.

TextMe views ecosystem participation as an important part of our fraud and robocall mitigation system. By actively participating in the ecosystem, we can do our part to identify, block, and prevent illegal traffic. Additionally, ecosystem participation empowers us to learn from best practices and industry trends, as well as contribute our knowledge and experience. Here are a few examples of how we collaborate across the industry:

- TextMe acts rapidly upon receipt of traceback requests, taking swift action to investigate blacklist the identified bad actor from accessing the TextMe service again and respond to the ITG. We take the opportunity to evaluate each identified call for potential evolution of our fraud detection systems.
- TextMe cooperates with law enforcement agency requests. We value the opportunity to contribute to law enforcement in order to be a good corporate citizen and a positive force in the ecosystem. We have invested significant time and resources into developing tools and processes as well as training staff, all with the goal of being able to efficiently and timely respond to requests with the requested information.
- TextMe has been a member of the CTIA since 2019.
- TextMe has been a member of the CFCA since 2024.

PROCESS EVOLUTION

TextMe commits to constantly investing to continually increase our platform integrity and to improve our anti-robocall and anti-abuse systems. We commit to iterate with both event-driven and proactive approaches, updating our practices on at least an annual basis if not much more frequently as part of our ongoing daily operations. Additionally, please note that TextMe has adopted the following administrative compliance control procedures:

- TextMe will complete its annual RMD recertification each year, and will ensure all RMD filing information is true and correct as of recertification.

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- TextMe will update its RMD filing (including this Robocall Mitigation Plan and any required portal fields) within ten (10) business days of any change to required information.
 - TextMe will maintain multi-factor authentication (MFA) for RMD access and limit RMD account access to authorized personnel.
 - TextMe will update its CORES (FRN registration) information within ten (10) business days of any change.