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## ROBOCALL MITIGATION PLAN

Company: Proximiti Communications, Inc.

Name of Signatory: Donald C. Davis

Title of Signatory: CFO

Address: 4030 Henderson Blvd, Ste 598

City, State, ZIP: Tampa, FL 33629

Telephone: (813) 579-1036

E-Mail: don.davis@proximiti.com

FRN: 0017614769

Service Provider Code: 796J

Other business names associated with Company:

Proximiti Technologies, Inc. (FRN: 0016431603)

MessagePro, Inc. (FRN: 0028556504)

Go Solo Technologies of Florida One, Inc. (FRN: 0022763650)

SipStorm, Inc. (FRN: 001761444)

Remote Care Partners, Inc. (No FRN Assigned)

Date Filed: June 16, 2025

Proximiti Communications, Inc. is a small voice services provider, under 47 C.F.R. § 64.6304, and has fully implemented STIR/SHAKEN. Accordingly, Proximiti Communications, Inc. (the "Company") is providing an update of its previously filed Robocall Mitigation Plan to ensure that illegal traffic does not originate on their networks as they work within the industry to implement STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

The Company's designated contact for Robocall Mitigation issues is:

Andrew Kirk  
Chief Security Officer  
4030 Henderson Blvd, Ste 598



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Tampa, FL 33629  
Telephone: 704-859-4142  
E-Mail: Andrew.Kirk@messagepro.com

The Company is not a foreign voice service provider.

All voice traffic that originates on our network is subject to the following robocall mitigation policies:

**Call Authentication:**

- All customer calls are authenticated by source IP  
(Customer IP Whitelist – all other sources are blacklisted)
- [REDACTED]
- All calls must originate with the callerid assigned

**Blacklists:**

- [REDACTED]
- Blacklists/Blocklists are created for repetitive call attempts by source IP dynamically
- All SPIDS/OCN that do not belong to the company are blacklisted
- Well known exploit user agents are blocked at customer entry points
- Captcha gateway implementation – customer enabled – not dynamic

**Session Detail and Call detail record analysis:**

- Calls are verified and signed utilizing our own Service Provider Code token and certificate
- [REDACTED]

**Other mitigations to prevent robocalling**

- Calls are rate limited by source customer ip and account to prevent large burst calls
- Customers in some products have access to captcha-like technology to prevent robocallers – random dialed digits to enable call to complete
- Customer opt in blacklists to block known calling number sources
- Threshold monitoring provided by Session detail and call detail record analysis collected and reported at the Customer level by call capture tools such as [REDACTED] and reported by various open source analytic and graphical software such as [REDACTED] and monitored by operations personnel

At the Customer level, the Company vets subscribers on an ongoing basis

- Company's customer base consists entirely of small business customers, who do not generally generate robocalls



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- Company collects and verifies information about each customer at time of signup
- Company's Terms of Service do not allow customers to resell services
- Company's Terms of Service allow it to take unilateral and immediate action to terminate or modify services where customers are engaged in prohibited activities:

"You agree that the Proximiti Business Plan does not confer the right to use the Service for auto-dialing, call center activities, continuous or extensive call forwarding, call relaying, telemarketing, fax broadcasting or fax blasting, and that you may not use the Service for those purposes. Additionally, significant deviations from statistically average business usage as measured by Proximiti from time to time may result in disqualification from unlimited usage plans."

"Proximiti may terminate this Agreement, or any Service Proposal or Service Order, in whole or in part, or suspend any or all of the Services, without incurring any liability, at any time upon written notice of ... (d) any governmental prohibition concerning the providing of, or any required alteration of, the Services or any violation of applicable law, rule or regulation resulting from the Services."

In accordance with the FCC's Eighth Report and Order in WC Docket No. 17-97:

- Company has registered with the Policy Administrator
- Company has our own SPC token
- Company utilizes our own certificate for signing
- Company authenticates all calls with that certificate (directly or through a third party in compliance with the Commission's rules relative to the third party roles and recordkeeping).

Furthermore, Proximiti Communications, Inc. will 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.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donald C. Davis". The signature is fluid and cursive, with the first name "Donald" being more prominent.

Donald C. Davis  
Senior Vice President