

PrimeCall Communication Robocall Mitigation Plan March 2025

I. Introduction

1. PrimeCall communication (“PrimeCall communication” or “Company”) provides Unified Communications services to its business customers. Its offices are located at: 5435 Worster Ave., Sherman Oaks, CA 91401.

PrimeCall communication’s services are designed to connect its business clients with consumers who have expressed interest in business clients’ products or services. PrimeCall communication provides these services using Bulk Solutions as their underlying Voice over Internet Protocol (VoIP) provider.

2. PrimeCall communication retails VoIP calling services and all telecom services are provided on a Resale basis. As a telecom reseller, PrimeCall communication is dependent on our underlying provider’s assistance with monitoring their network for fraudulent voice calling patterns.

3. Company’s underlying provider Bulk Solutions has implemented STIR/SHAKEN and Robocall Mitigation Plans in accordance with the STIR/SHAKEN authentication Framework.

II. Robocall Mitigation

1. Responding to Traceback Requests:

PrimeCall communication understands that responding to traceback requests is a critical obligation for voice services providers. PrimeCall communication is committed to supporting efforts by the FCC to trace the origin of suspected illegal robocalls through the chain of interconnected voice service providers and to ensure compliance with the TRACED Act insofar as it may apply to PrimeCall. As a provider, however, PrimeCall communication can and will investigate traceback requests using its internal platform/system to assist in identifying the source of illegal or suspicious robocall.

PrimeCall communication will respond fully within 24 hours of its receipt of a traceback request from the FCC, law enforcement agencies, and the Industry Traceback Group (“ITG”) or other entity designated by the FCC, and will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. Upon receipt of a traceback request, PrimeCall communication shall: acknowledge its receipt of the request within a timely fashion, within 24-hours of its receipt; conduct an internal investigation to trace the call within our network; review call detail records; document its finding clearly; provide a transparent response sharing details it has learned from its investigation and if applicable, noting any corrective actions taken; maintain records as required by applicable

regulations; and where required by the FCC, follow up with any additional reporting requirements.

PrimeCall communication devotes sufficient resources to providing prompt and complete information to traceback requests. The Company's point of contact to oversee traceback requests is:

Name: Priyanka Joseph

Title: Manager

Contact Info: priya@primecall.com

(323) 647-7463

If PrimeCall communication does not have direct access to the call history or call detail records, it will contact its underlying carrier/partner and request that such information be provided within twenty-four (24) hours.

2. Know Your Customer:

PrimeCall communication implements a robust and thorough Know Your Customer (KYC) procedure aligned with industry standards to ensure compliance, mitigate risk, and maintain network integrity. Below is a comprehensive outline of our current KYC practices:

a) Customer Onboarding Process: PrimeCall communication acquires customers primarily through local business relationships, referrals, and word-of-mouth marketing. Our onboarding process includes:

- Verification of customer business registrations.
- Collection and validation of customer tax identification numbers.
- Completion of customer onboarding forms to document key details.

b) Identity Verification Methods: PrimeCall communication manually verifies customer identities by:

- Reviewing official business registration documents.
- Validating Tax Identification Numbers provided by customers.
- Automated or digital verification tools are currently not utilized.

c) Risk Assessment Procedures: PrimeCall communication assesses customer risk by:

- Conducting credit checks to evaluate financial stability and creditworthiness.
- Reviewing business reputation within local communities.
- Monitoring initial and ongoing transactional behavior for irregularities.

d) AML/CFT Compliance: PrimeCall communication follows industry-standard AML/CFT compliance procedures by:

- Screening customers against relevant sanction lists (e.g., OFAC).
- Conducting Politically Exposed Persons (PEP) and adverse media checks manually during onboarding.

e) Documentation and Recordkeeping:

- Customer identification documents, credit reports, and transaction histories are securely maintained for the entire duration of the customer relationship.

- Records are securely disposed of after customers terminate their relationship with PrimeCall communication.
 - PrimeCall communication adheres to strict industry-standard measures (encryption, secure access control, data redundancy, etc.) to protect sensitive customer information.
- f) Enhanced Due Diligence (EDD):
- Customers classified as high-risk based on credit assessment or business type undergo enhanced due diligence.
 - High-risk customers are subject to increased monitoring frequency and additional verification checks periodically.
- g) Training and Internal Compliance:
- PrimeCall communication maintains a dedicated internal compliance function responsible for monitoring regulatory adherence.
 - Staff involved in onboarding and managing customer relationships undergo compliance training at least annually, covering KYC procedures, AML/CFT compliance, data privacy, and fraud detection.
- h) Ongoing Monitoring:
- Transaction monitoring is conducted continuously to detect unusual patterns or activities.
 - Customer records and risk assessments are periodically reviewed (at least annually) to ensure up-to-date compliance.
- i) Incident Reporting and Escalation:
- PrimeCall communication maintains clear procedures for reporting and escalating suspicious transactions internally to senior compliance officers.
 - Suspicious activities that meet regulatory reporting thresholds are promptly reported to appropriate regulatory authorities.
- j) Regulatory Compliance and Audits:
- PrimeCall communication adheres to telecom industry regulations, including those enforced by the Federal Communications Commission (FCC) and relevant local telecom authorities.
 - Internal compliance audits are performed annually, with external compliance audits conducted as required by regulatory standards or specific contractual obligations.
- k) Regulatory Standards and Frameworks: PrimeCall communication operates in alignment with industry-specific regulatory frameworks and standards, including:
- Federal Communications Commission (FCC) regulations
 - Telephone Consumer Protection Act (TCPA)
 - General Data Protection Regulation (GDPR) standards (where applicable)

3. International Calling:

The Company does not sell services to international call originators and does not operate as a foreign carrier.

4. Call Analytics:

PrimeCall communication does not currently use any third-party call analytics or monitoring services for blocking illegal robocalls. We must rely on our underlying provider to determine if calls should be blocked based on analytics practices.

5. Other Robocall Mitigation Practices:

The Company adds fraudulent lead contact information to its internal suppression lists such that any future lead submissions matching fraudulent info (i.e., mobile number, email, etc.) will not be permitted.

6. Call Blocking:

This is not applicable as the Company only provides lead generation services.

7. Updating RMD and Robocall Mitigation Plan (RMP)

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(d)(5), (e)(5) and (f)(5), PrimeCall communication will update its submission in the RMD within 10 business days of any change to the applicable information it must provide and update in the RMD. The Company's RMP continues to develop as the Company and the industry gain expertise and deploy new robocall mitigation strategies and will be supplemented in future updates.