

Thinkbright LLC

Robocall Mitigation Plan – April 2024

This robocall mitigation plan is for Thinkbright LLC, with headquarters at 42 Winslow Road White Plains NY 10606.

We perform the following roles in the call chain:

- A voice service provider with a Robocall mitigation plan implementation obligation serving end-users
- A voice service provider with a Robocall mitigation plan obligation acting as a wholesale provider originating calls

THINKBRIGHT LLC has not been prohibited from filing a certification in the Robocall Mitigation Database.

THINKBRIGHT LLC does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

THINKBRIGHT LLC uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics best practices to monitor outbound voice traffic to prevent the origination or transit of illegal robocalls.

We have inbound Robocall Mitigation and STIR/Shaken capabilities available via our carrier Voip Innovations to assist in our efforts to not terminate any inbound suspected Robo callers, and notify our clients of suspicious calls via headers

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

ThinkBright LLC certifies that all of the calls that it carries or processes on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(c), which shall include reasonable steps to avoid carrying or processing illegal robocall traffic and shall include a commitment 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 carry or process calls. The filer also certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has not implemented the STIR/SHAKEN authentication framework on any portion of its network for carrying or processing calls.

Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

To further ensure Thinkbright LLC network is not utilized for the origination, termination, or carrying or processing of unwanted and illegal robocalls, Talkie provides the following name, title, department, business address, telephone number, and email address of the individual within Thinkbright LLC that leads Thinkbright LLC team that handles robocall mitigation-related

issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Contact Name: David Merel

Contact Title: CEO

Contact Department: Customer Service

Contact Street Address: 42 Winslow Road Contact City: White Plains

Contact State and Zip Code: New York 10606

Contact Telephone Number: (212) 920-7709

Contact Email: dmerel@thinkbright.net

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(d)(5), ThinkBright LLC 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.

This is 24-hour window applies within business days, per rule 47 C.F.R.