

RevenueWell

ROBOCALL MITIGATION PLAN

RevenueWell offers an integrated practice management software solution tailored for the needs of dental practices and that includes interconnected VoIP and text messaging functionality. The communications functions are provided via resale of Twilio Inc. (“Twilio”), and RevenueWell necessarily relies on Twilio for its full STIR/SHAKEN implementation and robocall mitigation policies related to the detection and blocking of unlawful robocalls originating from RevenueWell’s customers.

RevenueWell has adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by Twilio and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: RevenueWell’s specialized service is purchased nearly exclusively by dental practices (with the few other customers typically also in health care services). The company’s telephone service is typically only purchased with the company’s software, so Revenue Well has greater familiarity with the nature of its customers’ business than most telephone service providers. RevenueWell collects the customer’s legal name and address, physical location, state of incorporation, federal Employer Identification Number, the nature of business from each customer. In addition, customer contact information is validated for purposes of 10DLC registration for SMS compliance.

Service Terms: Customers that use RevenueWell’s telephone service for any unlawful purposes, including unlawful robocalls, are subject to suspension or termination of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

RevenueWell necessarily relies on Twilio’s use of call analytics systems to identify and block unlawful robocall traffic. If RevenueWell receives a report or alert from Twilio of suspected unlawful robocall traffic originated by a RevenueWell end user customer, RevenueWell will conduct an investigation. To the extent a customer is found to have violated its terms of service, RevenueWell will take action commensurate with the severity of the customer’s offense, including, but not limited to, providing the customer with a warning or terminating the customer’s service.

Knowledge of Upstream Providers

RevenueWell’s upstream provider, Twilio, is a well-known, reputable wholesale service provider that is registered in the FCC’s Robocall Mitigation Database. RevenueWell does not have access to information regarding the upstream providers from which Twilio receives traffic but understands from Twilio’s mitigation plan that Twilio’s direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

RevenueWell is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group (“ITG”), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by RevenueWell customers, and will cooperate with Twilio on traceback requests.

Additional Robocall Mitigation Program Measures

The RevenueWell software does not allow third parties to use its services for robocall purposes through reasonable technical limitations.

The RevenueWell software does not allow the use of a Caller ID to a telephone number that is not provisioned in the Customer’s PBX by the RevenueWell software.

To send voice traffic through the RevenueWell VoIP platform, users must provide valid authentication credentials that customers are required to keep secret. This ensures that the appropriate Caller ID is transmitted that matches the credentials.