

BULLFRONG GROUP, LLC.

STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Bullfrog Group, LLC. (“Bullfrog Group”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Bullfrog Group has in place to mitigate illegal robocalls. Bullfrog Group may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

Bullfrog Group has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed from the Database by the Commission.

Bullfrog Group has not been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with Bullfrog Group’s findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

STIR/SHAKEN IMPLEMENTATION

Bullfrog Group will comply fully with all conditions set forth in the FCC’S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission’s rules and policies more generally.

Bullfrog Group is implementing STIR/SHAKEN through use of the Underlying Provider. This is a managed end-to-end call authentication solution that fully satisfies the FCC’s STIR/SHAKEN requirements. Through its Upstream Provider the Company provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

The Company is reliant upon the services of their Upstream provider, First Digital to assign and attest to the validity of calls. The Company uses First Digital as its primary provider for all services and therefore First Digital assigns and attests to the numbers they provide to Bullfrog Group. The attestation and assignment of calls as level A. If and when in a minimal case First Digital does provide a level B attestation. However Bullfrog Group does not normally or in most; if not all cases have any other numbers supported outside of the Company’s designated Upstream Provider.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the Bullfrog Group has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. The Bullfrog Group will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the Bullfrog Group determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. Bullfrog Group is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Bullfrog Group has not received information suggesting that robocalls are originated on its network. Therefore, Bullfrog Group does not consider its network at high risk of originating illegal robocalls.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Customer Due Diligence: Bullfrog Group conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Bullfrog Group confirms the customer's service address for all customers.

- Bullfrog Group verifies customer's business reputation prior to providing service.
- Bullfrog Group verifies customer information when contracts are renewed or services are added.
- Bullfrog Group verifies the customer's identity and their right to use the telephone number presented on calls.
- Bullfrog Group has the policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Direct IP Intermediate Carrier Due Diligence: Bullfrog Group takes appropriate steps to know the immediate service provider to ensure that the immediate upstream provider is not using it to carry or process a high volume of illegal traffic.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- Bullfrog Group has in place an enforceable terms of use and/or an acceptable use policy. Bullfrog Group also has in place policies designed to detect and prevent fraudulent traffic on its network.
- Bullfrog Group uses analytics technologies and services provided by its upstream provider to monitor traffic on its network and identify potentially unlawful call origination activity. If Bullfrog Group has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Bullfrog Group can suspend and/or terminate service to the customer.

- Bullfrog Group blocks the following types of calls by default with such calls that are originating from invalid numbers per FCC Order 2017 Call Blocking Order and calls from DNO numbers as per FCC Order 2017 Call Blocking Order.
- Bullfrog Group also blocks the following types of calls:
 - ✓ Describe any blocking based on FCC safe harbors – analytics, network-based blocking, etc.
 - ✓ Describe any other blocking policies.
 - ✓ As an originating service provider and/or intermediate carrier that is immediately downstream from a bad actor, will block traffic from the bad actors when notified by the commission

Responding to Traceback Requests

- Bullfrog Group has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It either has provided the ITG with the contact information and business hours for those individuals or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- Bullfrog Group will respond within 24 hours of receipt of traceback request to inquiries received from the Industry Traceback Group. If a pattern of questionable activity is detected, Bullfrog Group will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

Bullfrog Group will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, Bullfrog Group will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Bullfrog Group has deployed call authentication, call labeling, and call blocking services provided by the Company's Underlying Provider. We have made great strides to protect our networks and consumers from harmful calls. Bullfrog Group is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Bullfrog Group primary place of business is:

Address: 901 Tower Dr. Suite 305

City, State, Zip: Troy MI, 49098

Phone: 248-247-7200

Website: www.bullfrog.net

Leaders of the Bullfrog Group are:

CEO

Name: Ben Rife

Address: 901 Tower Dr. Suite 305

City, State, Zip: Troy MI, 49098

Phone: 248-247-7205

Email: ben@bullfrog.net

COO

Name: Kevin Rollert

Address: 901 Tower Dr. Suite 305

City, State, Zip: Troy MI, 49098

Phone: 248-247-7201

Email: kevin@bullfrog.net

Designated RMD Contact:

Name: Kevin Rollert

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City, State, Zip: Troy MI, 49098

Phone: 248-247-7201

Email: kevin@bullfrog.net

MEASURES TO PREVENT ORIGINATION OF ILLEGAL CALLS:

Know Your Customer:

Bullfrog Group has a rigorous KYC policy for the in order to support the Business Customers that it sells services to. Bullfrog Group has an in-depth presales process where

representatives of Bullfrog Group work with the prospect or customer to understand all the unique factors of the Customer's business. This objective of this is twofold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

Bullfrog Group performs a thorough reputation check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Not only does Bullfrog Group have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between Bullfrog Group and customers are governed by an MSA which specifically states the business Customer is not able to resell any services which the Bullfrog Group resells and the services which are sold to the Customer are strictly for the Customers own internal use.