



1700 W. Market St. #173
Akron, OH 44313

Robocall Mitigation Plan

June 2025

This Robocall Mitigation Plan (RMP) is being provided pursuant to the TRACED Act and the rules adopted by the Commission requiring Voice Service Providers (VSP) to file a Robocall Mitigation Plan within the Robocall Mitigation Database. Although Drips does not appear to meet the definition of a VSP—and reserves its position that it is not a VSP—in an abundance of caution, and without admission, it hereby submits its RMP.

Drips is a software company, adhering to the telecommunications industry best practices.

Drips is currently exempt from STIR/SHAKEN signing of calls because Drips does not actually originate calls as a VSP or intermediate provider and “lack[s] control over the network infrastructure necessary to implement STIR/SHAKEN.”

1. Acceptable Use Policy (AUP)

Drips’ AUP requires the responsible use of our software, systems, and services by our Clients. All Clients are required to comply with all applicable laws and regulations in the use of the Drips service, including the TSR, TCPA and related regulations.

2. We Know Our Customers

In addition to reviewing and confirming business information such as taxpayer identification, incorporation details, management team, and other pertinent corporate information, our sales team is trained to ask probing questions to clearly understand the nature of our Clients’ business. Drips reviews Clients’ opt-in methods and assures opt-out methods are clear and easily understood.

Additionally, as part of Drips commitment to preventing unwanted or unlawful traffic from accessing its network, Drips will conduct appropriate checks consistent with its Know Your Customer (KYC) policy on all potential Clients to understand the intended use of Drips’ platform before permitting access to any of Drips infrastructure, systems, or services. It is Drips policy that this KYC check be completed and approved before Drips will onboard the Client.

Existing Clients may be asked to update the KYC check process annually. Failure to complete the KYC check may result in removal from the platform. Additionally, Drips may conduct ad hoc checks of existing Clients based on suspicious Client activity or complaints.

3. We Know Our Upstream Providers

As previously stated, Drips does not operate as a VSP. As such, Drips does not accept or carry upstream traffic from providers. Drips practices due diligence with respect to KYC procedures in an effort to mitigate illegal calls. Drips performs a rigorous review of each Client and requires contracts to be put in place prior to Clients accessing the Drips platform. Drips deploys a



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proprietary mix of analytics to monitor platform traffic activity along with the use of third-party software to assist with flagging suspicious activity for further internal review.

4. Drips Will Take Steps to Discipline/Terminate Clients That It Learns Are Not Complying with the Law

Drips also reviews potential Clients to ensure they understand and agree to adhere to the TCPA and TSR legal requirements and are aligned with the CTIA's recommendations regarding Consumer Contact.

Drips Client contracts provide clear expectations that its Clients are in compliance with all federal and state laws and regulations and violations of these will not be tolerated. Drips reserves the right to investigate Client activity and terminate as necessary if fraud or illegally activity is detected.

If Drips receives notice of potential spam or fraudulent traffic, its production and development teams will meet and analyze at least the last seven days of data of the suspect activity.

In addition to review from notices, Drips Clients will be subject to random traffic audits once the Client has completed onboarding. Any suspicious traffic will be investigated, and Drips will engage the Client as appropriate.

If Drips learns that these requirements are not being met, Drips has the contractual right to take appropriate action—including potential termination of services.

5. Telephone Number Authorization

Drips only sends messages and API voice calls that use telephone numbers that are directly leased by Drips from our carrier partners on behalf of our Client. Each telephone number is assigned to a specific Drips' Client for use by only that Client.

6. Traceback Activity and Support

Drips is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal calls that originate from its Clients' services.

7. Plan Update Information

Due to the changing nature of the telecommunications industry and associated regulatory requirements, this RMP is subject to change at any time and such changes will be communicated and filed as necessary.