



May 11, 2026

via the Robocall Mitigation Database

ClearCaptions, LLC Robocall Mitigation Plan

ClearCaptions, LLC ("ClearCaptions") submits for the Commission's consideration its Robocall Mitigation Plan.

ClearCaptions is a certified Internet Protocol Captioned Telephone Service ("IP CTS") provider. IP CTS allows the user to listen to the other party on the telephone call and read captions of what the other party is saying. IP CTS uses the Internet to provide captions to the IP CTS user. ClearCaptions uses automated speech recognition technology, with or without the assistance of a Communications Assistant ("CA"), to transcribe the non-IP CTS user's words into captions and deliver them via the Internet to the IP CTS user's phone or device. ClearCaptions offers IP CTS service for registered customers using a specially designed phone and/or through a wireless device, such as an iPhone or iPad.

The majority of ClearCaptions customers obtain their telephone service from another provider, either a local exchange carrier or a provider of Voice Over Internet Protocol ("VoIP"), which would be the entity responsible for STIR/SHAKEN implementation with respect to those users. For other users, ClearCaptions procures an interconnected VoIP service from an underlying provider to integrate into its IP CTS service. ClearCaptions believes its integrated IP CTS offering is an information service but files this Robocalling Mitigation Plan because the definition of voice service provider is broad and ClearCaptions supports the Commission's efforts to reduce and eliminate unlawful robocalls.

STIR/SHAKEN Implementation Status

ClearCaptions is an IP CTS provider and believes its service is an information service. ClearCaptions is submitting this mitigation plan voluntarily in support of the Commission's anti-robocall objectives. For purposes of its Robocall Mitigation Database filing, and this Plan, ClearCaptions is certifying as a voice service provider without a STIR/SHAKEN implementation obligation. This Plan describes the reasonable steps ClearCaptions takes to avoid originating illegal robocall traffic in connection with any calls it originates (including any integrated interconnected VoIP functionality provided through an underlying partner) ClearCaptions is not acting as a gateway provider or a non-gateway intermediate provider.

ClearCaptions is not a telecommunications carrier or provider of private telecommunications services. Instead, it is an information service provider offering IP CTS. However, ClearCaptions recognizes that efforts to mitigate illegal robocalls involve multiple strategies, including STIR/SHAKEN. To the extent STIR/SHAKEN may apply in scenarios where ClearCaptions could be considered a "voice service provider," ClearCaptions remains committed to exploring potential integration of STIR/SHAKEN capabilities for VoIP-originated calls in its product development roadmap.

ClearCaptions is not required to have a Form 499A on file with the FCC and therefore is unable to obtain a Service Provider Code (SPC) token under the Governance Authority's revised

SPC Token Access Policy. Accordingly, ClearCaptions is exempt from implementing STIR/SHAKEN at this time.¹ This extension applies until such time as the SPC Token Access Policy is revised to make ClearCaptions eligible for an SPC token. *See* 47 CFR Section 64.6304(b).

ClearCaptions does not control the underlying network infrastructure typically required to implement STIR/SHAKEN in the manner of a traditional telecommunications or VoIP provider. The majority of ClearCaptions customers receive their telephone service from a local exchange or VoIP provider, which would be responsible for STIR/SHAKEN authentication. Where ClearCaptions obtains interconnected VoIP service from a partner, that partner applies applicable STIR/SHAKEN procedures.

Regardless of whether the customer obtains telephone service from a local exchange or VoIP provider, or if ClearCaptions provides IP CTS that includes an integrated VoIP service, ClearCaptions “lack[s] control over the necessary network infrastructure to implement STIR/SHAKEN.”² ClearCaptions does not have any switches and is not involved in the routing of any voice traffic processed as IP CTS. Accordingly, ClearCaptions is excluded from an obligation to implement STIR/SHAKEN under 47 CFR Section 64.6304(b). Nevertheless, ClearCaptions will continue to monitor industry and regulatory developments, including the evolution of STIR/SHAKEN eligibility rules. Should ClearCaptions become eligible for an SPC token or if the rules change, ClearCaptions will revisit compliance steps to implement or support STIR/SHAKEN directly.

Bandwidth supplies ClearCaptions with underlying NANP numbering resources and delivers ClearCaptions’ IP CTS customer calls to and from the PSTN. As a result of this relationship, Bandwidth authenticates all ClearCaptions’ calls that originate on Bandwidth’s telephone numbers and are subject to STIR/SHAKEN. Additional information regarding Bandwidth’s STIR/SHAKEN implementation can be found at: <https://www.bandwidth.com/regulations/stir-shaken/>.

Traceback Commitment

ClearCaptions commits to: (a) taking all reasonable steps to avoid originating illegal robocall traffic; (b) responding fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium; and (c) cooperating with such entities in investigating and stopping any illegal robocallers that use ClearCaptions’ service to originate calls.

¹ *See* 47 C.F.R. § 64.6305(d)(4)(vi). ClearCaptions also does not act as a Gateway Provider or Non-Gateway Intermediate Provider as defined by the Commission’s rules. *See* 47 C.F.R. §§ 64.6300(d), (i).

² *See Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, para. 40 (2020) (excluding from a STIR/SHAKEN implementation obligation those providers that lack control over the necessary network infrastructure); *Call Authentication Trust Anchor*, Second Report and Order, 36 FCC Rcd 1859, para. 19 (2020). *See also* 47 C.F.R. § 64.6305(d)(2)(i).



Company Information

The contact information for the individual within ClearCaptions responsible for addressing robocall mitigation-related issues is as follows:

Michael Strecker
Chief Regulatory & Compliance Officer
ClearCaptions, LLC
3026 Owen Drive
Suite 111
Antioch, TN 37013
(916) 274-8429
Mike.strecker@clearcaptions.com

Traceback operations contact

Traceback requests are operationally handled by Nistha Patra, Sr. Manager TechOps & Reliability at nistha.patra@clearcaptions.com (402-999-3198), backup contact William Purvis, Director of TechOps/IT operations at William.purvis@clearcaptions.com (832-671-6814) with after-hours escalation to Night Shift SRE at sre@clearcaptions.com (629-910-9634). ClearCaptions will ensure traceback requests are acknowledged and fully responded to within 24 hours.

Customer Vetting Process

As indicated above, ClearCaptions procures NANP telephone numbers from its VoIP provider partner. Before assigning any one of these telephone numbers to an individual user, the individual must provide ClearCaptions registration information designed to ensure that they are a valid, qualified IP CTS user, namely a hard-of-hearing individual user of IP CTS service. The IP CTS user must complete a Registration Form and a Self-Certification of hearing loss form. Among other details, ClearCaptions obtains from each potential customer their full name, complete and verifiable registered address, date of birth, and the last four digits of their Social Security Number. Once it becomes operational, ClearCaptions will be required to provide this registration information to the TRS User Registration Database ("TRS-URD") and then validate the eligibility of each call by querying the TRS-URD.

ClearCaptions typically does not "renew" its customers service plans. Rather, once a customer is found to be a valid, qualified IP CTS user and completes the Registration Form and Self-Certification, the user remains a customer of ClearCaptions until they stop using the service. As noted above, once it becomes operational, ClearCaptions will provide customer registration information to the TRS-URD for each new and existing IP CTS customer and validate eligibility of each call through the TRS-URD.

Upstream Provider Vetting Process

To the extent ClearCaptions could be considered a voice service provider, it does not accept calls directly from any upstream voice providers for origination. ClearCaptions relies on a VoIP provider, Bandwidth.com (<https://www.bandwidth.com/>), for all numbering resources and interconnected VoIP functionality. ClearCaptions has an annual review with its VoIP provider ensuring said provider is continuing its effort to eliminate illegal robocalling through a KYC/onboarding process, monitoring, detection, and other preventive means.

Authentication, Monitoring and Mitigation

ClearCaptions currently employs and is refining multiple strategies to reduce the likelihood that its services could be used for unlawful robocalling.

ClearCaptions has confirmed with its underlying NANP numbering resource provider, Bandwidth, that Bandwidth will authenticate ClearCaptions' calls that originate on Bandwidth's telephone numbers and are subject to STIR/SHAKEN. ClearCaptions also relies on any analytics software adopted by Bandwidth for monitoring call traffic on Bandwidth's network.

ClearCaptions will ensure (directly and/or through its underlying VoIP partner) that it blocks any calls purporting to originate from a number on a reasonable do-not-originate list, consistent with 47 CFR § 64.1200(o).

ClearCaptions Billing and Business Intelligence team monitors IP CTS users' calling patterns, including unusual customer behavior in the form of a high volume of calls being placed during the month. This monitoring is done using SQL-based analysis to identify any abnormal patterns.

ClearCaptions investigates calling activity for indicators of illegal robocalling or fraud, including, for example: (i) sustained outbound call volume (ii) short-duration call attempts and (iii) repeated failed call attempts or sequential dialing patterns.

If the investigation of abnormal patterns confirms suspicious or fraudulent activity, ClearCaptions and/or its partner will take remedial actions including, where appropriate, terminating service.

ClearCaptions also uses network border security elements to identify abnormal call patterns, which utilize machine learning, behavioral analytics and threat intelligence to identify any malicious and/or illegal activity as well as several AWS tools (*e.g.*, Amazon GuardDuty, AWS Web Application Firewall, and AWS CloudTrail). These measures will further help block and/or identify illegal or malicious behavior including illegal robocall traffic.

ClearCaptions also prevents IP CTS devices from placing or receiving calls from international IP addresses. Revenue Assurance checks for "International IP Address" for calls NOT in 'US','PR','GU','VI'.

Alerts generated through the analytics described above are reviewed by the Revenue Assurance Manager on a bi-weekly basis. When an alert meets escalation criteria, ClearCaptions opens an internal case, documents findings, and escalates to Internal Service Operations team and Compliance for review. Confirmed suspicious activity results in remedial action up to and including suspension or termination of service and/or number assignment, consistent with



ClearCaptions' Terms of Use and applicable law. In the event of a high-priority detection, ClearCaptions shifts to a daily evaluation and response approach during which Compliance and other necessary internal teams are pulled into the investigation. Only after the matter has been addressed does Revenue Assurance Manager revert to a bi-weekly approach.

Terms of Use

Every ClearCaptions customer agrees to comply with the Company's Terms of Use governing IP CTS. Among other provisions, the Terms of Use prohibit customers from using ClearCaptions' service to engage or participate in communications or conduct of an abusive, pornographic, lewd, obscene, harassing, fraudulent or unlawful nature. The Terms of Use further specify that ClearCaptions' service can only be used for communications permitted by all applicable laws, including FCC rules, and customers agree to use the service in compliance with all applicable laws. IP CTS users agree to use ClearCaptions' service exclusively to engage in communication with one or more individuals and not to use the ClearCaptions service for any other purpose. ClearCaptions Terms of Use provide that it may terminate service in the event that ClearCaptions determines the customer is using service contrary to the Terms of Use, subject to notice of improper usage where such notice is reasonable.

Formal Actions or Investigations

None. Neither ClearCaptions nor any affiliate, parent, or commonly controlled entity has, in the last two years, been the subject of any formal action or investigation with accompanying findings of actual or suspected wrongdoing due to (a) transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing or (b) a deficient Robocall Mitigation Database certification or mitigation program description.

Ownership and Management

The chart appended as Exhibit A depicts the ownership of ClearCaptions. The Company has one subsidiary (ClearWellness LLC) that does not provide telecommunications, voice, or IP CTS services.

ClearCaptions is managed by its managing member, ClearCaptions Intermediate, LLC. Effective May 5, 2026, the Board of Managers of ClearCaptions Intermediate, LLC include Aaron Shapiro, Jeff Fang, and Robert Rae. Additional information regarding the management of ClearCaptions, including the identities of its executives and officers, can be found at: <https://clearcaptions.com/about-us/>.

Ongoing Robocall Mitigation Plan Updates

ClearCaptions anticipates that its Plan will evolve over time, and ClearCaptions will update its Plan on file with the Commission within ten business days following the date of any changes to the Plan.

In addition to updating the Plan text, ClearCaptions will update its Robocall Mitigation Database filing (including any changes to certification information such as STIR/SHAKEN implementation status, contact information, or robocall mitigation program description) within 10 business days of any change, consistent with 47 CFR § 64.6305(d)(5).

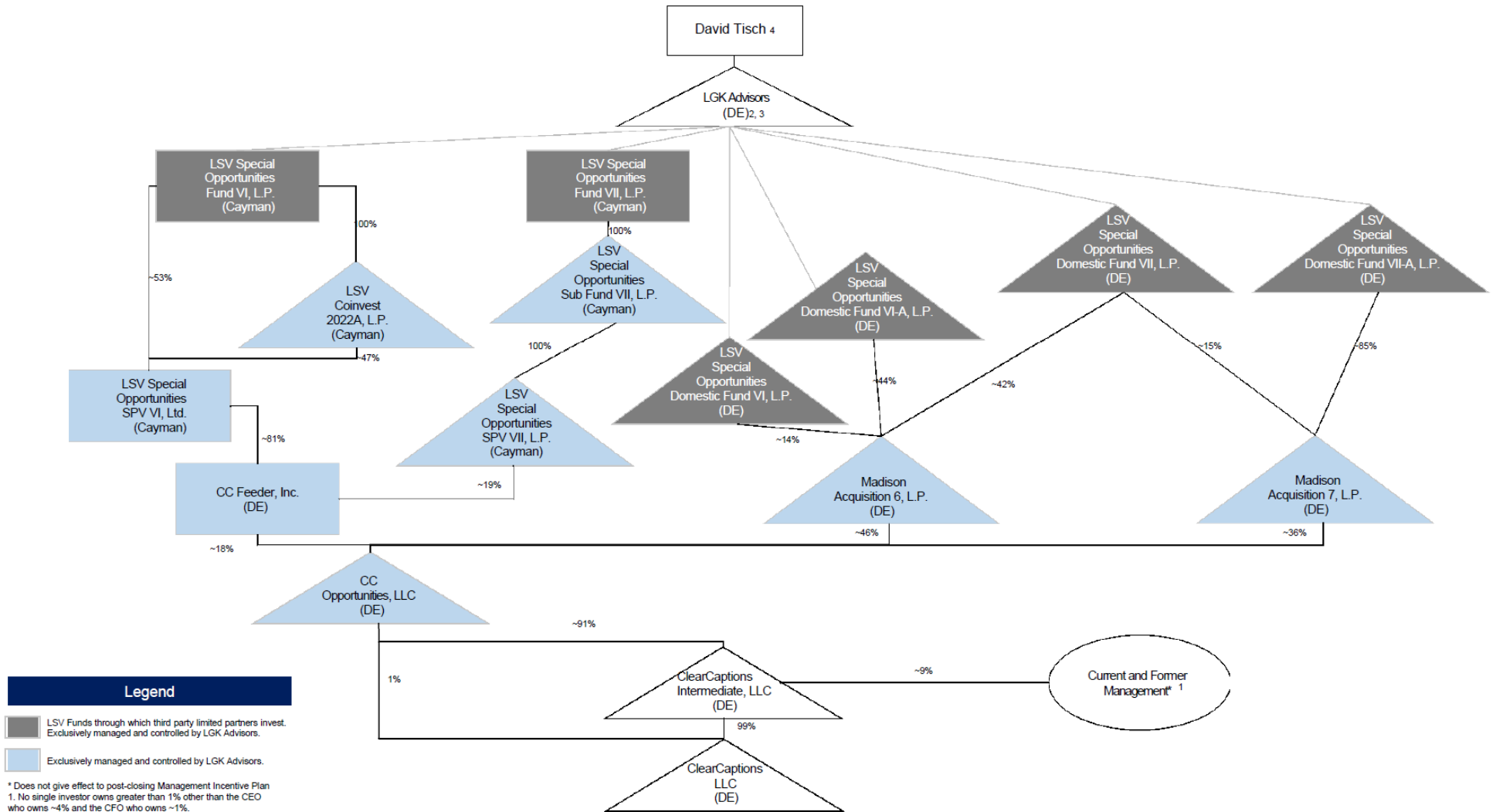


ClearCaptions will recertify its Robocall Mitigation Database filing annually by the relevant deadline.

ClearCaptions will update its CORES registration information associated with its FCC Registration Number (FRN) within 10 business days of any change.

Exhibit A

Corporate Ownership Structure of ClearCaptions



* Does not give effect to post-closing Management Incentive Plan

1. No single investor owns greater than 1% other than the CEO who owns ~4% and the CFO who owns ~1%.

2. LGK Advisors invests through a general partner commitment which is de minimis in amount and represents less than 1% of the indirect equity interest in ClearCaptions on a look-through basis. 3. LGK Advisors is owned and controlled by affiliates of David Tisch. LGK Advisors serves as the investment adviser to the LSV Funds. Please refer to Section IV and related footnote 23 thereto in the final certification application.

4. David Tisch is a U.S. Person.