



Robocall Mitigation Plan

Marchex and its subsidiaries (collectively “we” or “Marchex”) offer a range of analytics services to business clients that include call analytics helping clients track and evaluate advertising performance by measuring and analyzing calls generated from various advertising media as well as optional recording, transcription and/or other analytics services related to our clients’ inbound or, in some cases, outbound calls helping our clients measure and improve the performance of their sales and customer service agents. As an information service provider, Marchex is not itself a voice service provider. [REDACTED]

[REDACTED] All the voice service providers we work with to process calls in the US as of the date this plan is submitted have their own filing in the Robocall Mitigation Database.

We take the issue of illegal robocalls and the protection of our customers from unwanted calls very seriously. We have multiple call spam blocking solutions available as part of our analytics products, [REDACTED]

[REDACTED]

Our analytics terms of service include acceptable use provisions that prohibit our clients from using our services to “make any harassing, unsolicited, or unwanted phone calls or to engage in any form of fraudulent, misleading, or deceptive practices” or otherwise using our services “in any manner or for any purpose that violates any applicable law or regulation or any right of any person, including intellectual property or rights of privacy.” Further, we reserve the right to “prohibit any use of our services we believe may be (or is alleged to be) in violation of our terms of service or could reasonably become the subject of any legal, regulatory, or other governmental proceeding or process, including any law enforcement proceeding, process, or inquiry.”

Marchex is committed to participating in traceback efforts by responding fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and/or the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that may attempt to use our services to process illegal robocalls.