

CallMultiplier Robocall Mitigation Plan – February 2026

Business Information

CallMultiplier, Inc.
201 Robert S Kerr Ave, Suite 210
Oklahoma City, OK 73102
(877) 685-8485

Overview

CallMultiplier, Inc. ("CallMultiplier") is a small VSP dedicated to stopping illegal calls from traversing its network. CallMultiplier is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As delineated herein, CallMultiplier works closely with its upstream providers to carry out the required robocall mitigation functions.

Know Your Customer ("KYC")

CallMultiplier's KYC program involves obtaining specific information when a subscriber signs up for service. This process includes collecting such information such as:

- Customer name;
- Phone number;
- Email address;
- Physical location;
- Federal Tax ID number if applicable; and
- Nature of the customer's business.

We attempt to personally contact all new Customers during the onboarding process which allows for additional vetting where necessary.

Terms of Service

CallMultiplier maintains a Terms of Service agreement that subscribers must agree to before being permitted to use CallMultiplier's network.

The Terms of Service is here: <https://www.callmultiplier.com/terms-of-service>

CallMultiplier's Terms of Service specifies that CallMultiplier may suspend or terminate service for violation of same.

Acceptable Use Policy ("AUP")

CallMultiplier also maintains an AUP that subscribers must agree to before being permitted to use CallMultiplier's network.

The AUP is here: <https://www.callmultiplier.com/responsible-use>

The AUP is used in conjunction with the Terms of Service agreement to clarify proper use of the CallMultiplier service and enforce penalties, including account suspension, for any violations.

Analytics for Monitoring Traffic

CallMultiplier works with its upstream providers to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- Anomalies in cost generated by calls from a single customer;
- Unusual calling volumes;
- Unusually high levels of opt-out requests from customer's message recipients;
- Anomalies in call scheduling patterns; and
- Anomalies in call completion rates.

No third-party vendors are involved in deploying CallMultiplier's analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of possible illegal robocalling, CallMultiplier works with its upstream providers to follow defined procedures on investigating such subscribers.

The procedures established include, but are not limited to:

- Checking recent and past call detail records and benchmark against expected trends;
- Checking recent and past account activity and purchases;
- Investigating if any system issue generates the questionable behavior; and
- Contacting the subscriber to understand their particular use case and validate that the activity belongs to that subscriber.

CallMultiplier follows Industry Traceback Group ("ITG") recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, CallMultiplier will devote sufficient resources to provide prompt and complete resources to traceback requests.

CallMultiplier certifies that it will respond to all traceback requests within 24 hours of receiving same.

CallMultiplier works with its upstream providers to investigate suspicious activity found by the carrier's monitoring systems or reported to CallMultiplier by subscribers or third parties. The investigation could potentially result in opening a traceback request or with CallMultiplier contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their traffic.

Blocking

CallMultiplier will implement Do Not Originate requests it receives from the ITG. CallMultiplier's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If CallMultiplier and/or its upstream carriers identifies suspected robocalling patterns that are confirmed by further investigation, CallMultiplier will take appropriate action which may include suspending or terminating the subscriber's use of CallMultiplier's service. CallMultiplier will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve in response to the dynamic nature of mitigating illegal robocalling. CallMultiplier will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapt to this ever-changing issue.

In the event of any material change to this plan, CallMultiplier will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.