

Bright Pattern Robocall Mitigation Plan

Customer Verification

We follow industry best practices for verifying caller identity as outlined by the NANC Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

Bright Pattern requires each customer to provide a Letter of Authorization certifying that they own the phone numbers they use as caller ID, or that their clients own these numbers and have granted permission for their use.

Our customer onboarding process uses an invoicing system that may include credit checks, verification of physical mailing addresses, full legal names, valid email addresses, and legitimately assigned phone numbers. Customers pay invoices through reputable, verifiable vendors using traceable payment methods.

Call Tracing Cooperation

We fully cooperate with all traceback requests from the FCC, law enforcement agencies, and registered traceback consortiums. We work with these entities to investigate and stop illegal robocallers who use our service to place calls.

Robocall Prevention Program

Our system is designed not to allow calls to originate from unknown numbers - all numbers are either purchased from us by our customers or entered as "on-behalf" calling numbers about which they either provided ownership documentation themselves, or ownership documentation and permission from their clients. Any manual call transfers carrying the original customer calling number are logged against the tenant and user in that tenant who did this.

We allow automated dialing for notification purposes provided the customer complies with the applicable law.

All calls are logged and can be traced to the originating tenant and user. We immediately investigate any flagged calls to determine if the caller attempted to place unlawful robocalls. If we confirm unlawful activity, we either warn the customer to stop or terminate their service.

Policy Enforcement

Bright Pattern's standard contracts and Acceptable Use Policy (AUP) include provisions prohibiting customers from using our services for fraudulent, deceptive, misleading, or abusive activities.

Our Acceptable Use Policy requires customers to:

1. Obtain and maintain legal permission or consent from all parties they contact
2. Contact only those parties they are legally permitted to contact
3. Contact authorized parties only in legally permitted ways

The AUP places an affirmative obligation on customers to comply with all applicable federal and state laws in the United States.

Bright Pattern maintains the contractual right to terminate customers who fail to comply with our acceptable use requirements.