

Amended Robocall Mitigation Plan

Infinity Tracking, Inc.

Overview

Infinity Tracking, Inc. (“Infinity”) provides call tracking and call analytics services that help our clients to see which campaigns, channels, and keywords are most effective in causing their target audience to pick up the phone and buy, so that they can make better advertising and marketing investment decisions. The clients of Infinity’s tracking and analytics services use our platform to track inbound calls that are transmitted through our platform and terminated by the clients’ respective carriers to their call centers. The outbound calls from Infinity’s tracking platform all originate from third parties who are calling Infinity’s call-tracking clients. Infinity does not provide the capability for its call-tracking clients to originate voice calls to the PSTN.

Infinity has a small, legacy PBX service that include the ability to make and receive calls to the PSTN. Infinity does not operate or control the facilities or network for originating, transmitting, or terminating interconnect voice-over-Internet-protocol calls.¹

Infinity is committed to providing its services in accordance with legal and regulatory requirements and works closely with its carriers to ensure the FCC’s robocalling mitigation requirements are met.

Infinity submits the following amended Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(1), which updates and replaces the Robocall Mitigation Plan originally submitted on September 27, 2021.

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:

Know Your Customer Practices. All of Infinity’s clients who use our platform for tracking inbound calls are vetted during our sales process, and we do not allow automated registration. When client accounts are created, we verify the following information as part of the onboarding process:

- Business Address
- Business Phone Number
- Industry
- Website if applicable

¹ Infinity “lack[s] control over the network infrastructure necessary to implement STIR/SHAKEN,” and is accordingly “exempt from STIR/SHAKEN implementation requirements.” *Call Authentication Trust Anchor*, Eight Report and Order, para. 8, FCC 24-120 (rel. Nov. 22, 2024); *see also Call Authentication Trust Anchor*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd. 3241, 3260, para. 40 (2020).

Monitoring. For our legacy PBX service, we monitor usage parameters based on anticipated traffic. These parameters allow us to identify potential misuse based on observed fraudulent usage patterns. Pending investigation, accounts may be suspended or closed.

Remediation. If a PBX customer is found to be using Infinity's service in violation of its terms and conditions, Infinity has the ability to suspend violators' access.

Upstream Provider Practices. Infinity works with three carriers as its underlying providers for its calls in the United States: Bandwidth, Inteliquent/Sinch, and DIDWW. Infinity is committed to working with these providers' compliance teams to promptly respond to any violations of law related to fraudulent calling and perform applicable remediation measures.

Commitment to Respond to Traceback Requests:

Infinity is willing and able to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Statement Under 47 C.F.R. § 64.6305(d)(iv):

Infinity has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

This Robocall Mitigation Plan describes the specific measures that Infinity has implemented as of April 29, 2025. Infinity continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.

Signature:



Tom Cavill
Head of Telephony

Dated: April 29, 2025