

Robocall Mitigation Plan of Interactivetel, LLC

Provider Name: Interactivetel, LLC

FRN: 0026775908

RMD ID: RMD0007899

OCN ID: 920J

Point of Contact for Robocall Mitigation Issues:

Steven Dalton, CFO

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Summary:

Interactivetel, LLC takes a multi-pronged approach to Robocall Mitigation.

For outbound robocall mitigation from our customers to the PSTN (Know Your Customer), we:

- Provide an easy way for other carriers to report nuisance calls to us and investigate all reports with a written response
- Have implemented strong know-your-customer policies
- Have implemented strong know-your-upstream-provider policies
- Require positive identification of all customers with a FEIN or Drivers License
- Will not serve any customer which is not a verifiable US-based corporation or LLC
- Require executed contracts with all commercial customers which specifically prohibit the use of our service for any illegal activity
- Suspend and/or terminate service to any customer found to have violated our agreement after notice and an opportunity to cure
- Ensure that all outbound calls are being properly signed via STIR/SHAKEN.
- Do not permit our numbers to be activated or used for text messaging with any other provider
- Keep all call detail records and SMS for at least 5 years
- Routinely monitor call flows and traffic volumes from customers to detect anomalies.
- Investigate traffic bursts and other suspicious traffic patterns when they occur

For inbound robocall mitigation from the PSTN to our customers (Know Your Upstream Provider), we:

- Source all PSTN connectivity from regulated US carriers.
- Provide an easy way for our customers to report nuisance calls to us and investigate all reports
- Allow customers to blacklist callers on a per-customer basis.
- Routinely monitor call flows and traffic volumes from other carriers
- Investigate traffic bursts and other suspicious traffic patterns when they occur
- Keep all call detail records and SMS for at least 5 years

Details:

1. Provider Role in Call Chain

Interactivetel is a voice service provider delivering hosted telephony, call analytics, and call tracking services primarily to automotive dealerships and related businesses nationwide.

2. STIR/SHAKEN Implementation

- Fully implemented across IP network using Sansay infrastructure.
- No exemption or extension claimed.

3. Robocall Mitigation Measures

a. Customer Vetting & Onboarding

- Primarily provide service to established automotive dealerships.
- Clients regulated under FTC, SOX, and banking/consumer protection.
- No automated/anonymous signups.

b. Ongoing Monitoring & Call Analytics

- In-house analytics to detect suspicious traffic.
- Third-party monitoring supplements.
- Immediate investigation/suspension for unlawful activity.

c. Upstream/Partner Due Diligence

- Contractual and operational controls with FCC regulated upstream providers (Sinch, Commio, Bandwidth etc.)

- No interconnection with unvetted providers.

4. Traceback and Enforcement Cooperation

Interactivetel commits to responding fully to traceback requests within 24 hours and cooperates with the Industry Traceback Group and other enforcement bodies.

5. Contact and Corporate Information

- Business Address: 1 Olympic Place #900, Towson, MD 21204
- Compliance Officer: Steven Dalton, CFO
- Principals: Interactivetel LLC, CallRevu LLC, CRVT Holdings LLC, Serent Capital LLC

Description of Corporate Ownership:

- Interactivetel, LLC is a wholly owned subsidiary of CallRevu, LLC.
- CallRevu, LLC is owned by CRVT Holdings, LLC
- CRVT Holdings, LLC is owned by Serent Capital, a private equity firm.
- Neither Serent Capital nor any of its portfolio companies other than CallRevu provide Interconnected VOIP services.

6. Certification

Interactivetel certifies that:

- All calls originated are subject to a robocall mitigation program;
- It has fully implemented STIR/SHAKEN;
- It maintains effective measures to prevent unlawful robocalls;
- It has disclosed its corporate ownership and affiliates;
- It will continue to respond fully to traceback requests within 24 hours.

Submitted on behalf of Interactivetel, LLC