



Madwire, LLC
3420 E Harmony Rd. Suite 125
Fort Collins, CO 80528

Robocall Mitigation Plan

This robocall mitigation plan is for Madwire, LLC, with headquarters at:

3420 E. Harmony Rd.
Fort Collins, CO 80528

We perform the following role in the call chain:

A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

Madwire, LLC has not been prohibited from filing a certification in the Robocall Mitigation Database.

Madwire, LLC does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Madwire, LLC uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

Our voice services are available only to our marketing/advertising customers. We verify that all customers are legitimate businesses by confirming business addresses, speaking to a customer representative on the phone during the sales process, requiring and reviewing a live website to perform services, and taking other steps to verify the legitimacy of the customer. Further, our services require a marketing/advertising package which is significantly more expensive than a traditional voice service plan, which will dissuade robocall companies from using our service for robocalls.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we will terminate their service.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers. We only use one upstream provider, Bandwidth, Inc. We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

Our contractual provisions with the upstream provider prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We significantly limit the type of calls that may be originated through our system which makes using our system to facilitate robocalls a practical impossibility. We only permit outbound calls to be generated to one specific number manually input into our system, and, further, outbound calls may only be generated upon receipt of an inbound call to a specific marketing/advertising tracking phone number. In other words, a call is only originated when a third-party calls one of our customer's phone numbers listed on a digital advertisement. This inbound call then originates a phone call through our system to our customer's one specific phone number that they have manually set in our system. If a customer wants to make outbound calls to a different number, they have to manually update the number in our system. There is no way in our system to make outbound calls outside of this limited system or to multiple numbers programmatically. This extremely limited outbound calling system makes using our service for robocalls a practical impossibility.

We also review phone call traffic and activity within our systems, as well as activity in our software. We immediately investigate any identified suspicious calls or activity to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service and/or block the phone calls.

We review our mitigation policies to ensure compliance with FCC regulations.

STIR/SHAKEN

All calls that originate through our voice service comply with the STIR/SHAKEN framework to

authenticate caller ID information for IP-based voice calls. This ensures that the caller ID information is accurate and has not been tampered with. All originated calls are signed and attested by Bandwidth, Inc. using their STIR/SHAKEN framework.

Certification

We certify that the above-described Robocall Mitigation Program is in place and actively enforced to prevent illegal robocalls from originating on our network.

Updates and Revisions

This document will be reviewed and updated regularly or as required by changes in FCC regulations.
