

Conference America, Inc.

Robocall Mitigation Plan 2025

1. Company Information

Legal Entity Name: Conference America, Inc.

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FCC Registration Number (FRN): 0017-9627-21

2. Certification Statement

Conference America certifies it has implemented a robocall mitigation program pursuant to the FCC requirements for all voice traffic that originates on its network, and will fully comply with the Commission, law enforcement, and the Industry Traceback Group (ITG).

At present Conference America is not yet signing calls via STIR/SHAKEN but is actively working toward implementation as outlined in Section 4.

3. Call Origination Overview

Conference America provides VoIP based communication services. Depending on service type:

- PBX Environment: Employees place outbound calls through PSTN using SIP carriers that are connected to the telephony network.
- Conferencing Services: Calls originate from Conference America's conferencing servers, are transmitted to our carriers, and are then routed through the PSTN.

In all cases, calls originate on Conference America managed equipment or servers and are transmitted to a carrier with established PSTN connectivity.

Types of Calls: Domestic and international calls, including business voice communication.

Jurisdictions Served: United States and applicable international jurisdictions.

4. STIR/SHAKEN Implementation Plan

Current: Conference America does not sign outbound calls using STIR/SHAKEN. All calls are delivered via SIP trunking partners without direct STIR/SHAKEN authentication.

Planned Implementation: Conference America is actively in the process of meeting the STIR/SHAKEN requirements. The company has begun filing for a 499-A Filer ID and Operating Company Number (OCN) from NECA. Once those are secured, we will request an SPC Token from the STI-GA and procure a STIR/SHAKEN certificate to begin call signing. Once issued:

Calls originating from platforms that support signing (conferencing servers) will be signed directly.

For the PBX environment Conference America will use delegated call signing authorizing our carrier to sign calls on our behalf using Conference America's own STIR/SHAKEN certificate.

Timeline:

Estimated Implementation – October 2025

FCC compliance deadline: October 2025.

Additional controls and ongoing mitigation efforts are detailed in the following section Robocall Mitigation Program Components.

5. Robocall Mitigation Program Components

Conference America certifies that as part of its robocall mitigation efforts it is taking these specific reasonable steps to avoid originating illegal robocall traffic.

Customer Vetting Procedures – Customers using the conferencing platform are either internal teams or pre-approved clients onboarded through Conference America's standard business practice.

Monitoring and Ongoing Review – The conferencing platform includes internal mechanisms that monitor for abnormal outbound call behavior and can send email alerts on suspicious patterns.

Remediation and Enforcement – Conference America investigates and remediates any incident of suspected fraud or unauthorized calling activity involving its telephony platforms. In the event of an incident such as leaked conference credentials or compromised PBX extensions the company initiates the following remediation steps:

- Immediate disabling of the affected access of feature
- Resetting PINs/Passwords and hardening access
- Notifying impacted users or customers
- Internal verification to determine if the activity was authorized or malicious

While no incidents have required regulatory reporting to date, Conference America remains prepared to report verified abuse to law enforcement or the FCC in accordance with applicable requirements.

Affected accounts may be restricted, suspended, or permanently terminated based on the severity of the violation.

Acceptable Use Policy – Conference America publishes and maintains an Acceptable Use Policy available in our Terms and Conditions. The AUP permits Conference America to terminate service to any Customers for numerous violations, including but not limited to unlawful Robocalls.

Prohibited Practices – Conference America prohibits the following practices on its conferencing and PBX platforms:

- Unauthorized use of outbound calling features
- Re-origination of PSTN traffic or any use of the platform for illegal call routing
- Use of spoofed or manipulated caller IDs or mislead recipients
- Accessing or registering to the PBX without permission
- Use of services for unlawful, fraudulent, or malicious purposes

Any attempt to bypass call routing restrictions, falsify call identity, or otherwise misuse the system may result in service termination and escalation as required by law or FCC regulations.

Traceback Cooperation – Conference America certifies that it will respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. As of this filing date, Conference has not received any such traceback requests.

Conference America certifies that it will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Employee Training – Conference America maintains a structured training program tailored to the operational realities of its telephony systems and the distinct teams that manage them.

Annual Robocall Mitigation Training will be conducted for compliance staff, network operations, and customer support. This covers the legal landscape, robocall patterns, and mitigation responses.

Specialized Training will be provided for those handling traceback requests, reviewing call records, and enforcing usage controls. This includes how to respond to ITG or FCC inquiries, validate traffic sources, and document incidents.

Apart from this Conference America consistently provides information security training for all employees. This training covers data protection frameworks, secure policies, and regulatory requirements. Refresher courses are conducted regularly to ensure awareness remains current and aligned with evolving threats and best practices.

Complaint Handling Process –

- Dedicated email and phone for robocall complaints
- Complaints logged, investigated within 10 business days
- Corrective actions documented and reviewed by compliance officer

Updates and Plan Maintenance – Conference America certifies that this Robocall Mitigation Plan will evolve to respond to the constantly changing practices and techniques that are used to detect and prevent illegal robocalling. Conference America will continue to monitor industry best practices and improve its internal processes to ensure that this Robocall Mitigations Plan is current. In the event of

any material change to this Robocall Mitigation Plan, Conference America will submit an updated Robocall Mitigation Plan to the FCC's Robocall Mitigation Database.

6. Third Party Controls

- Due diligence conducted on upstream and downstream providers
- Vendor audits performed annually

Compliance Officer Certification:

Robert Pirnie

EVP