

PhoneBurner Robocall Mitigation Plan Overview

PhoneBurner is an information services provider, which procures phone service from another provider, either a local exchange carrier or a VoIP provider. PhoneBurner lacks control over the network infrastructure necessary to implement STIR/SHAKEN. PhoneBurner believes that its platform is an information service but files this Robocall Mitigation Plan because the definition of Voice Service Provider is broad, and it supports the Federal Communications Commission's robocall mitigation effort.

PhoneBurner does not control the underlying network infrastructure typically required to implement STIR/SHAKEN in the manner of a traditional telecommunications or VoIP provider. PhoneBurner "lack[s] control over the necessary network infrastructure to implement STIR/SHAKEN." PhoneBurner does not have any switches and is not involved in the routing of any voice traffic. The PhoneBurner platform cannot make phone calls without the services of a regulated telecom carrier.

PhoneBurner's telecom providers supply PhoneBurner with its underlying NANP numbering resources and deliver PhoneBurner's customer calls to and from the PSTN. These carriers authenticate PhoneBurner calls and are subject to STIR/SHAKEN.

PhoneBurner utilizes a multi-faceted approach to detect, prevent, and mitigate illegal robocall activity across its platform. It integrates multiple internal and external data sources to evaluate customer actions, identify anomalous or high-risk calling behavior, and support rapid intervention consistent with Commission requirements. In addition to its other compliance-related policies and procedures and employee training, PhoneBurner maintains a comprehensive and reliable Know Your Customer (KYC) and robocall mitigation program.

The Commission strengthened robocall mitigation rules and requirements in its January 6, 2026, Eighth Report and Order in CG Docket No. 17-59. PhoneBurner's policies and procedures are aimed at meeting or exceeding those requirements as well as 47 CFR § 64.6305(a). This includes contractual requirements that clients must comply with all laws. PhoneBurner's Acceptable Use Policy can be found at <https://www.phoneburner.com/acceptable-use>. PhoneBurner employs a layered and strategic analytics framework that supports lawful outreach, carrier trust, and industry credibility through KYC protocols and Responsible Communications® standards. This framework is designed to safeguard against unlawful outreach practices.

KYC protocols include identity verification and authentication (name, email, business title, address), business verification and authentication (business name, address, EIN, state of formation), Ekata business verification standards (phone number verification, IP address) and anti-fraud measures. Once onboarded, customer traffic is monitored by PhoneBurner to detect and swiftly remediate call patterns that are indicative of unlawful calling practices. PhoneBurner reinforces these safeguards through Responsible Communications® standards that provide a structured set of tools, processes, and compliance practices designed to ensure that clients communicate lawfully, ethically, with high call-quality and network integrity. These robocall mitigation practices provide effective insights into call traffic and patterns. Suspicious calling behavior patterns across customer and network traffic can be identified and prompt notifications of high-risk activity or anomalies are provided. This enables timely

identification and prevention of suspicious traffic patterns. Real-time scrubbing against the national Do-Not-Call registry is available to customers with a do-not-call scrubbing obligation.

PhoneBurner conducts additional due diligence on its customers if it receives a notification alleging violation by the customer of consumer protection or telecommunications laws. If PhoneBurner receives such a notification or internal monitoring causes heightened concern about the customer's ability to use PhoneBurner services in compliance with the law and PhoneBurner standards, PhoneBurner reserves the right to terminate services to that customer.

To the extent PhoneBurner could be considered a voice service provider, it does not accept calls directly from any upstream voice providers for origination.

PhoneBurner will respond to Traceback requests from the FCC, FTC, law enforcement agencies, or the Industry Traceback Group within 24 hours of receiving notice, or within any longer timeframe specified by the requester and will update this robocall mitigation plan within 10 days of any modifications.