



Robocall Mitigation Program (RMP)

Updated September 2025

I. Introduction

Pursuant to applicable Federal Communications Commission ("FCC") orders and regulations, MobileDollars, LLC has developed this Robocall Mitigation Program ("RMP") to prevent unlawful robocalls from originating, terminating, or being carried on our network. This program outlines the reasonable steps we take to comply with FCC requirements, protect our customers, and preserve the integrity of the U.S. voice ecosystem. When providing voice services, MobileDollars only resells the Voice over Internet Protocol ("VoIP") services of Commio which are listed and in good standing in the FCC's Robocall Mitigation Database. As a reseller, MobileDollars has certified that it has "not implemented the STIR/SHAKEN authentication framework on any portion of its network" because it is "unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN."

Company Summary

MobileDollars, LLC is a cloud-based business text messaging platform that enables organizations to engage customers through personalized and automated SMS and MMS campaigns. It offers features such as AI-triggered messaging, drip campaign automation, and dynamic personalization with support for pictures and video. Designed for industries ranging from real estate and fitness to professional services and ministries, MobileDollars.com helps businesses boost engagement, send reminders, promote events, and streamline customer communication.

II. Robocall Mitigation Program

(1) Implementing Knowing Your Customer (KYC) and Upstream Provider Protocols

As for knowing its upstream providers, as noted above, MobileDollars only resells service of wholesale providers that are in the FCC's Robocall Mitigation Database (RMD) and remain in good standing. MobileDollars conducts thorough KYC procedures when onboarding new or renewing customers. This includes verifying business identity, incorporation documents, contact information, and business purpose. We rely on upstream providers, including Commio, to ensure traffic routing is compliant and subject to fraud detection protocols.

(2) Requiring Contractual Provisions to Mitigate Illegal Robocalls

All MobileDollars customers are bound by our Terms of Service and Privacy Policy, which explicitly prohibit unlawful robocalling or spoofing. Any violation results in instant termination of services. MobileDollars reserves the right to suspend, block, or terminate accounts without prior notice if suspicious or illegal call activity is detected.

(3) Validating Customer's Right to Use Telephone Numbers

MobileDollars verifies that customers have legitimate rights to use the telephone numbers they originate calls from. Numbers are either assigned directly by MobileDollars or ported in from authorized carriers with proper validation.

(4) Blocking Calls on a Do-Not-Originate (DNO) List

MobileDollars enforces DNO list blocking at multiple levels: our upstream providers (e.g., Commio) apply DNO list screening, and as a secondary safeguard, MobileDollars applies additional blocking controls at the platform level.

(5) Only Accepting Traffic from Providers that Have Affirmatively Filed in the RMD

MobileDollars does not accept third-party voice service traffic. We originate all customer calls directly. To the extent traffic passes through upstream providers, those providers are required to have filed in the FCC's Robocall Mitigation Database (RMD) and remain in good standing.

(6) Analyzing and Monitoring Network Traffic

MobileDollars relies on Commio's CDR logging and real-time monitoring systems to identify anomalous traffic patterns. We are notified immediately if traffic is flagged as potentially fraudulent or illegal.

(7) Investigating Suspicious Calling Patterns

Upon notification of suspicious activity, MobileDollars investigates call logs and usage behavior, and will suspend or terminate customer accounts if evidence of unlawful robocalling is confirmed.

(8) Ensuring Foreign Providers Are Not Using Our Network Improperly

Through our upstream provider agreements, MobileDollars ensures that foreign carriers cannot use our platform to deliver high-volume illegal traffic into the U.S. network. All foreign interconnects are validated through Commio's compliance framework.

(9) Authenticating Voice Traffic

MobileDollars works with upstream providers to implement STIR/SHAKEN authentication where technically feasible, ensuring caller ID information is verified and transmitted accurately.

(10) Responding to Commission, Law Enforcement, and ITG Traceback Requests

MobileDollars commits to responding to traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) within 24 hours.

(11) Designating an Employee Responsible for Robocall Mitigation

Contact: Compliance & Network Security Lead
Email: Yaniv@mobiledollars.com
Phone: 954-592-9121

(12) Updating RMD Submission and RMP

MobileDollars will update its Robocall Mitigation Database filing within 10 business days of any relevant changes, including updates to contacts, procedures, or provider relationships.

(13) Employee Training

MobileDollars provides ongoing training to employees involved in customer vetting, network monitoring, and compliance to ensure they remain informed about emerging robocall threats and FCC regulations.