

The Edge Group, LLC - Robocall Mitigation Plan

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Company Overview

The Edge Group, LLC operates SalesOptima, a boutique CRM platform designed to empower businesses with a robust suite of tools for managing and enhancing customer relationships. SalesOptima offers a wide range of features, including contact management, sales automation, marketing automation, voice calling, SMS (inbound and outbound), MMS (inbound and outbound), outbound video texting, integrated call center software, email marketing, calendaring, and advanced reporting capabilities for contacts, leads, advertising, and finances.

All of our clients leverage advertising and lead generation services to build their databases ethically and responsibly. None of our clients engage in robodialing, purchasing and uploading contact lists, spamming, or any other prohibited activities. SalesOptima is designed for legitimate business communications, and we maintain personal business relationships with each of our customers, ensuring alignment with our values. As a boutique CRM, SalesOptima is highly integrated into the core systems and processes of our clients. We do not conduct business with any organization seeking to use our platform for robodialing or similar activities. In fact, our system does not include any capabilities for robodialing. Every outbound call must be manually initiated by a user clicking a button to call a specific contact, and there are no features to facilitate rapid, automated outbound calls.

SalesOptima supports extensive communication capabilities, enabling clients to send hundreds of millions of emails, exchange millions of text messages, and facilitate millions of minutes of phone calls. Through our platform, clients have collectively sold hundreds of millions of dollars in products and services, underscoring the value and integrity of the SalesOptima ecosystem.

To enhance our voice service capabilities, we partner with Bandwidth Inc., a leading global cloud communications provider. Founded in 1999 and headquartered in Raleigh, North Carolina, Bandwidth specializes in voice, messaging, and emergency services. Their Communications Platform-as-a-Service (CPaaS) enables enterprises to create, scale, and operate communication services across various applications and devices.

Network Infrastructure

SalesOptima integrates seamlessly with Bandwidth's Voice API to manage all voice communications. This integration enables features such as call initiation and routing, allowing users to manually initiate outbound calls by clicking a button within the CRM. Each call is processed through Bandwidth's secure network, ensuring reliable and high-quality voice services.

To safeguard against unauthorized use and potential fraud, SalesOptima employs several measures:

- **User-Initiated Calls Only:** Our system lacks automated dialing capabilities; every outbound call requires manual initiation by the user, preventing rapid, unsolicited call

dissemination.

- **Call Rate Limiting:** Bandwidth's infrastructure enforces call rate limits, ensuring that the number of calls per second (CPS) does not exceed predefined thresholds. This mechanism helps prevent abuse and maintains service integrity.
- **Fraud Detection and Monitoring:** Bandwidth continuously monitors call traffic patterns to detect and mitigate fraudulent activities. In the event of suspicious behavior, Bandwidth's Network Operations Center (NOC) may place restrictions on affected IP addresses and notify us for further action.

By leveraging Bandwidth's robust security features and adhering to best practices, SalesOptima ensures that all outgoing call traffic is secure, authenticated, and compliant with industry standards, effectively minimizing the risk of illegal robocall activities.

Robocall Mitigation Strategies

To ensure the integrity of our voice services and prevent illegal robocalls, The Edge Group, LLC, through our SalesOptima platform, employs a comprehensive set of strategies in partnership with Bandwidth:

- **Know Your Customer:** We collect and verify customer business identity and onboarding details (including owners, addresses, EIN) to establish a Brand, validate payment, and vet the customer's use case and business model. We document expected volumes, confirm acceptance of our terms, and require confirmation of data sources and proof of opt-in/subscription. Enhanced review is triggered by higher-than-expected call volume or elevated hard opt-out rates.
- **STIR/SHAKEN Implementation:** SalesOptima has implemented full STIR/SHAKEN caller ID authentication framework across its entire Internet Protocol (IP)-based network, consistent with 47 CFR § 64.6301(a). Call authentication and signing are performed using SalesOptima's own STIR/SHAKEN certificate through Bandwidth's hosted signing services. Bandwidth is solely responsible for the technological act of signing the call and SalesOptima retains sole responsibility for attestation selection and compliance with the Commission's STIR/SHAKEN rules. SalesOptima assigns attestation levels based on its verification of the calling party and confirmation of the calling party's authority to originate calls using the associated telephone number(s), consistent with applicable FCC rules, orders, and guidance.
- **Traffic Monitoring and Analysis:** Bandwidth employs advanced monitoring systems to analyze call patterns and detect anomalies indicative of fraudulent activity.
- **Call Blocking Tools:** Upon detecting unlawful robocall campaigns, Bandwidth implements call-blocking mechanisms to prevent such calls from traversing their network.
- **Compliance with Regulatory Requirements:** Bandwidth is registered in the FCC's Robocall Mitigation Database (RMD) and complies with all mandated robocall

mitigation directives.

By leveraging Bandwidth's robust infrastructure and adhering to these mitigation strategies, The Edge Group, LLC ensures that all voice communications via SalesOptima are secure, authenticated, and compliant with industry standards, effectively preventing the origination and transmission of illegal robocalls.

Commitment Statement

The Edge Group, LLC is fully committed to mitigating illegal robocalls and ensuring compliance with all FCC requirements. Through our partnership with Bandwidth, a trusted and industry-leading communications provider, we leverage advanced technologies, including the STIR/SHAKEN framework, to authenticate caller identities and prevent caller ID spoofing. This partnership ensures that all voice traffic originating from our SalesOptima platform adheres to the highest standards of security and integrity.

We actively monitor call traffic and collaborate with Bandwidth to detect and address suspicious or unlawful activity.

Our systems are designed to prioritize ethical and legitimate communication practices. We do not support or enable robodialing, spam, or any other activities that contravene regulatory guidelines. By integrating these robust measures, we reaffirm our commitment to creating a secure and reliable communication environment for our clients and their customers.

The Edge Group LLC has identified a single point of contact for traceback cooperation and remains committed to responding fully and within 24 hours to call traceback requests from the Commission, law enforcement, and the traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers initiating calls, including providing relevant call records and supporting information as requested.

The Edge Group LLC reviews and maintains its robocall mitigation program and updates it within 10 business days when filing information, services, traffic patterns, or risk controls change.