

Consumer Agent Portal, LLC dba TrustedChoice.com

Robocall Mitigation Program Description

FCC Registration Number (FRN): 0031506942

Business Address: 2262 26th Ave NW, New Brighton, MN 55112

Certification Category: TrustedChoice.com is filing under Option 3: No STIR/SHAKEN Implementation.

Rule Exemption: Pursuant to 47 CFR § 64.6301(a), TrustedChoice.com does not operate its own switching or origination network and instead provisions call tracking numbers through Bandwidth, which fully implements STIR/SHAKEN.

Company Role and Operations: TrustedChoice.com provides call tracking numbers (CTNs) on its consumer website to facilitate connections between consumers and independent insurance agencies. Calls originate on Bandwidth's network and are forwarded to agency phone numbers.

Robocall Mitigation Practices

- Use of Bandwidth as the underlying carrier implementing STIR/SHAKEN authentication.
- Controlled assignment of CTNs exclusively for inbound consumer-to-agency calls.
- AI-powered call analytics, spam detection, fraud prevention, and QA review.
- Immediate suspension and investigation of suspicious activity.
- Commitment to respond to traceback requests within 24 hours.
- Comprehensive Know Your Customer (KYC) verification for all participating insurance agencies.
- Ongoing annual review and monitoring of agency partners and call traffic.
- Enforcement procedures for any misuse or suspicious activity.

Prior Actions and Investigations

Action 1: August 25, 2025 Removal Order (DA 25-737)

(1) Law enforcement or regulatory agencies involved:

The FCC Enforcement Bureau ("EB") and Wireline Competition Bureau ("WCB"), under File No. EB-TCD-25-00038590 (previously EB-TCD-24-00036891).

(2) Date commenced:

The matter commenced when WCB notified the Company on March 29, 2024, that its RMD certification was noncompliant due to failure to submit an updated certification by the February 26, 2024 compliance deadline. On December 10, 2024, the Bureau issued a Show Cause Order directing the Company to cure deficiencies. On August 25, 2025, the Bureau issued Removal Order DA 25-737 removing the Company's RMD certification.

(3) Current status:

The Company's RMD certification was provisionally reinstated on September 5, 2025. During the relevant period, the Company underwent a change in ownership and the prior RMD contact email was no longer actively monitored. Upon becoming aware of the matter, the Company promptly engaged with the Bureau, updated contact information, and implemented internal compliance procedures.

(4) Summary of findings:

The Bureau found that the Company's RMD certification lacked information required under the enhanced filing requirements adopted in the Sixth Caller ID Authentication Report and Order. The findings were administrative and

compliance-related in nature. The Company was not the subject of findings relating to illegal robocalls, unlawful traffic, spoofing, or fraud.

(5) Final determinations:

The Bureau issued a final Removal Order on August 25, 2025 (DA 25-737). The Company was subsequently provisionally reinstated on September 5, 2025.

Action 2: March 24, 2026 Order (DA 26-282)

(1) Law enforcement or regulatory agencies involved:

The FCC Enforcement Bureau ("EB") and Wireline Competition Bureau ("WCB"), under File No. EB-TCD-25-00038590.

(2) Date commenced:

Between September 15, 2025 and January 28, 2026, the Bureau notified the Company that its provisionally reinstated RMD certification remained deficient and identified deficiencies requiring correction. On March 24, 2026, the Bureau issued Order DA 26-282 directing the Company to cure deficiencies within fourteen calendar days.

(3) Current status:

The Company is actively curing all identified deficiencies and has updated and recertified its RMD filing. Corrective actions include updating enforcement action disclosures, enhancing Know Your Customer (KYC) procedures, identifying third-party analytics vendors, and implementing ongoing compliance review procedures. The Company has formally responded to the FCC Enforcement Bureau and requested reinstatement.

(4) Summary of findings:

The Bureau found that the Company's RMD certification and robocall mitigation plan lacked certain required information concerning mitigation procedures and related disclosures. The findings were administrative and compliance-related in nature. The Company was not accused of originating illegal robocalls or engaging in unlawful telecommunications conduct.

(5) Final determinations:

No final determination has been issued under this Order. The matter remains pending while the Company completes corrective actions and awaits FCC review.

Conclusion

TrustedChoice.com relies on Bandwidth for STIR/SHAKEN authentication and maintains robust internal safeguards — including Know Your Customer procedures, AI-powered call analytics, and strict number assignment controls — to prevent the use of call tracking numbers for illegal robocalling. The Company remains committed to full cooperation with the FCC, traceback efforts, and ongoing compliance obligations.

Robocall Mitigation Practices

In accordance with 47 CFR § 64.6305(a), TrustedChoice.com maintains a robocall mitigation program that includes the following measures:

1. Use of a Certified Carrier Partner

- All call tracking numbers originate on Bandwidth's network.
- Bandwidth has implemented STIR/SHAKEN attestation on calls originating from its network.

2. Number Assignment and Access Controls

- Call tracking numbers are issued only for consumer-facing insurance referral services.

- Numbers are not sold or provided for general public use, and strict controls are maintained to prevent misuse.

3. Third-Party AI Telephony Platform and Call Analytics

TrustedChoice.com utilizes a third-party artificial intelligence (AI) telephony platform that provides real-time call analytics, spam detection, and fraud prevention capabilities. This platform:

- Automatically detects and terminates spam or fraudulent calls in real time.
- Provides real-time analytics and reporting on all call activity across assigned call tracking numbers.
- TrustedChoice.com's Quality Assurance (QA) team periodically reviews these analytics to identify anomalies, suspicious patterns, or potential indicators of illegal robocall activity.
- Any suspicious or potentially illegal robocall activity identified through the platform or QA review will result in immediate investigation, suspension of the affected number(s), and cooperation with Bandwidth and enforcement agencies.

4. Traceback Cooperation

- TrustedChoice.com commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group.
- We will work cooperatively with Bandwidth, the traceback consortium, and enforcement authorities to identify and remediate any misuse.

5. Know Your Customer (KYC) Program

TrustedChoice.com maintains a Know Your Customer (KYC) program designed to ensure that call tracking numbers are only assigned to verified, legitimate independent insurance agencies. The KYC program applies to both new and existing agency partners and includes the following components:

a. New Customer Onboarding and Verification

Before any call tracking numbers are assigned to a new agency partner, the agency must complete the following mandatory onboarding process:

- **Mandatory Onboarding Session:** Each prospective agency partner is required to participate in a mandatory onboarding session during which the agency provides details necessary to verify that it is a real, licensed insurance agency.
- **License Verification:** TrustedChoice.com verifies that the agency holds active, valid insurance licenses as required by applicable state regulatory authorities.
- **Business Verification:** TrustedChoice.com confirms that the agency is a legitimate operating independent insurance agency, including verification of business name, address, and contact information.
- **Master Service Agreement (MSA):** Each agency partner must execute TrustedChoice.com's Master Service Agreement prior to receiving call tracking numbers. The MSA includes provisions governing acceptable use of services, compliance with applicable laws and regulations, and grounds for termination, including misuse of assigned phone numbers or any involvement in illegal robocalling activity.

b. Ongoing Monitoring of Existing Customers

TrustedChoice.com applies its KYC program on an ongoing basis to all existing agency partners, not only at the point of initial onboarding:

- **Annual Review:** TrustedChoice.com conducts an annual review of all agency partners to re-verify that each agency continues to maintain active insurance licenses, remains a legitimate operating agency, and continues to comply with the terms of the MSA.

- **Continuous Traffic Monitoring:** Through the third-party AI telephony platform described in Section 3 above, TrustedChoice.com monitors call traffic associated with each agency partner on an ongoing basis. Anomalous call volumes, unusual patterns, or indicators of potential abuse are flagged for review by the QA team.
- **Enforcement and Remediation:** If any agency partner is found to be in violation of the MSA, engaged in suspicious call activity, or no longer meeting KYC verification requirements, TrustedChoice.com will suspend or terminate the agency's access to call tracking numbers and cooperate with law enforcement and the Commission as appropriate.

c. Specific Reasonable Steps to Mitigate Illegal Traffic

In addition to the measures described above, TrustedChoice.com takes the following specific reasonable steps to mitigate the risk of illegal robocall traffic on its platform:

- Call tracking numbers are provisioned exclusively for inbound consumer-to-agency calls; the platform is not designed or used for outbound dialing campaigns.
- The closed nature of the platform — in which numbers are assigned only to verified insurance agencies for a specific, defined use case — inherently limits the risk of misuse for illegal robocalling.
- TrustedChoice.com does not resell or wholesale phone numbers or telephony capacity to unvetted third parties.
- Any agency partner found to be misusing call tracking numbers will have service immediately suspended pending investigation, with permanent termination and referral to enforcement authorities as warranted.

6. Ongoing Compliance

- TrustedChoice.com reviews its processes periodically to ensure continued alignment with FCC robocall mitigation requirements.
- TrustedChoice.com has updated its RMD contact information to ensure that all future Bureau and Commission correspondence is received and acted upon in a timely manner.

Conclusion

TrustedChoice.com relies on Bandwidth for STIR/SHAKEN authentication and maintains robust internal safeguards — including a comprehensive Know Your Customer program, third-party AI-powered call analytics, and strict number assignment controls — to prevent the use of our call tracking numbers for illegal robocalling. We are committed to full cooperation with traceback efforts and to taking proactive measures to mitigate unlawful traffic.