

Robocall Mitigation Plan (FCC Submission)

Company Name: Media Flint, Inc. (dba AvidTrak)
FRN: **0020151809**
Filer Role: Originating Voice Service Provider

Contact Person: Amin Haq, CEO
Amin.haq@mediaflint.com
(310) 980-0056

1. Mitigation Program Overview

Media Flint, Inc., (dba AvidTrak) certifies that it has implemented a Robocall Mitigation Program in accordance with **47 CFR § 64.6305(a)** for all voice traffic originated on its network that is not subject to full STIR/SHAKEN authentication. This program includes reasonable and effective measures designed to prevent the origination of illegal robocalls.

2. Customer Vetting Procedures

Media Flint, Inc., employs a **strict Know Your Customer (KYC)** process before provisioning voice services to any customer.

This includes:

- Verifying the customer's identity by way of an email authentication system and a proprietary validation system by calling the customer who has to provide a valid telephone number from a reputable carrier.
- Requiring additional documentation such as a credit card.
- Reviewing intended use of telephony services and call volume expectations.

Customers must agree to Terms of Service <https://avidtrak.com/servicesagreement> that strictly prohibit illegal robocall activity. Violations result in immediate service termination.

3. Traffic Monitoring and Call Analytics

Media Flint, Inc., uses automated traffic monitoring tools to analyze call patterns in real time. These tools:

- Detect high-volume short-duration calls and anomalous calling patterns.
- Flag calls with invalid, spoofed, or unallocated caller IDs.
- Alert compliance personnel for further investigation and, when necessary, call blocking.

Suspicious traffic is subject to manual review and corrective action, including service suspension or termination.

4. Traceback Cooperation Commitment

Media Flint, Inc., commits to:

- **Responding fully and within 24 hours** to all traceback requests from the FCC, law enforcement, or the industry traceback consortium (e.g., USTelecom's ITG).
 - **Cooperating proactively** with such entities to identify and stop illegal robocall sources on our network.
 - Maintaining detailed call logs and internal notes to facilitate rapid traceback.
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5. STIR/SHAKEN Implementation

Media Flint, Inc., has fully implemented the STIR/SHAKEN authentication framework across all portions of its IP-based network and authenticates all calls it originates, as required by **47 CFR § 64.6301(a)(1) and (2)**.

6. Enforcement and Penalty Measures

Violations of Media Flint's robocall policy result in:

- Immediate investigation of the account.
 - Temporary call blocking during review.
 - Termination of services for confirmed violations.
 - Reporting of illegal activity to appropriate authorities.
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7. Ongoing Review and Updates

This Robocall Mitigation Program is reviewed **quarterly** by Media Flint's compliance team and is updated in response to:

- Changes in FCC rules or guidance,
 - Emerging robocall tactics,
 - Lessons learned through traceback participation or internal investigations.
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