

Robocall Mitigation Plan - 2024

Company Name: Project Broadcast

Project Broadcast is a text and email marketing platform with voice features. Project Broadcast is committed to complying with the Federal Communications Commission (FCC) regulations to mitigate illegal robocalls. Our organization uses Twilio for voice services, leveraging their technology to ensure compliance with STIR/SHAKEN protocols and to implement robust robocall mitigation measures. Additionally, we use Persona for Know Your Customer (KYC) verification, ensuring all users are identified before accessing our services. Project Broadcast does not own or operate any switching facilities or direct Public Switched Telephone Network (PSTN) connections.

Project Broadcast certifies compliance under 47 CFR § 64.6305(a) by implementing a robust robocall mitigation program in lieu of direct STIR/SHAKEN implementation. Project Broadcast relies entirely on upstream providers like Twilio, which are fully compliant with the STIR/SHAKEN authentication framework. This operational model prevents Project Broadcast from implementing STIR/SHAKEN directly but ensures all traffic is routed through a compliant provider. This document outlines our approach to ensuring legitimate call traffic and preventing unlawful activities.

1. STIR/SHAKEN Implementation Twilio, as our voice service provider, implements STIR/SHAKEN (Secure Telephone Identity Revisited/Signature-based Handling of Asserted information using toKENs) for all outbound calls originated from our platform. This ensures that:

- Calls originating from our network are authenticated with appropriate attestation levels (A, B, or C).
- Call recipients can verify the authenticity of caller IDs.

By using Twilio's platform, Project Broadcast ensures compliance with industry standards for caller authentication.

2. Robocall Monitoring and Mitigation Measures In addition to leveraging Twilio's STIR/SHAKEN capabilities, Project Broadcast employs the following measures to monitor and mitigate unlawful robocalls:

- **Call Authentication:** Ensuring all outbound calls pass through Twilio's authentication mechanisms.
- **Traffic Analysis:** Regularly reviewing call traffic patterns to identify and address anomalies or spikes that may indicate unauthorized activity.
- **Proactive Blocking:** Utilizing Twilio's tools to block known invalid or unassigned numbers.
- **Fraud Detection:** Collaborating with Twilio to detect and investigate potentially fraudulent activity on our account.
- **Complaint Resolution:** Establishing a process to promptly address reports of suspected illegal robocalls.

- **KYC Verification:** Requiring all users to complete a Know Your Customer process through Persona, which includes uploading a federal government-issued ID and a live selfie for identity verification. This ensures only verified users can initiate calls on our platform.
- **Terms of Service Enforcement:** All customers must agree to Project Broadcast's Terms of Service, which strictly prohibit using the platform for illegal robocalling activities.
- **Traceback Response:** Committing to respond to traceback requests from the FCC or other authorized entities within 24 hours to support investigations into suspected unlawful robocall activities.

3. Internal Policies and Procedures Project Broadcast has implemented the following internal practices to further mitigate robocall risks:

- **Account Security:** Ensuring all access to Twilio's platform is secured through robust authentication methods and access controls.
- **Compliance Training:** Training our employees on FCC regulations and robocall mitigation strategies.
- **Regular Updates:** Periodically reviewing and updating our robocall mitigation policies to align with regulatory changes and Twilio's advancements.

4. Continuous Improvement Project Broadcast is dedicated to maintaining and enhancing our robocall mitigation efforts. We commit to:

- Monitoring the effectiveness of our strategies.
- Adjusting our policies in response to new threats and regulatory developments.
- Ensuring transparency and accountability in our compliance practices.

5. Point of Contact The designated officer responsible for robocall mitigation and compliance within Project Broadcast is:

Name: Brian Knorr

Title: CTO

Email: brian@projectbroadcast.com

Phone: (214) 912-6690

6. Certification

Project Broadcast affirms compliance with 47 CFR § 64.6305(a) by ensuring all calls routed through Twilio are STIR/SHAKEN compliant and implementing a comprehensive robocall mitigation program as described above.