

Gloo, LLC Robocall Mitigation Plan
February 26, 2024

Background:

- Gloo offers automated call forwarding as part of our suite of services tailored to a subset of customers who utilize our text messaging solution.
- Gloo's text messaging solution makes use of Bandwidth verified TFNs. 45 of our customers benefit from an additional functionality where incoming calls placed to the TFN associated with the text messages are forwarded to their designated landline number.

Mitigation Plan:

In order to prevent robocalls from being forwarded through Gloo's systems, Gloo has implemented the following mitigation steps:

- 1) **Implement Call Authentication Technologies:** Gloo utilizes Bandwidth for our TFNs and call forwarding. Bandwidth implements STIR/SHAKEN technologies in their networks for automatic signing with full or "A" attestation and supports compliance with STIR/SHAKEN.
- 2) **Assessment:** Gloo analyzes customer complaints to determine the extent and potential impact of robocalls on customers.
- 3) **Regulatory Compliance:** Gloo ensures compliance with relevant regulations such as the Telephone Consumer Protection Act (TCPA) and the Federal Trade Commission (FTC) regulations.
- 4) **Collaboration:** Gloo is open to collaborating with telecom providers, government agencies, and industry groups to share information and coordinate efforts in combating robocalls.
- 5) **Legal Action:** Gloo supports pursuing legal action against persistent violators and actively supports law enforcement efforts to prosecute illegal robocall operations.
- 6) **Continuous Monitoring and Improvement:** Gloo monitors the effectiveness of the mitigation measures in place and adapts strategies as needed to stay ahead of evolving robocall tactics.