

Robocall Mitigation Plan

Concept Interactive Inc.

17 January 2025

Overview

Concept Interactive Inc. is committed to ensuring compliance with regulatory guidelines to mitigate illegal robocalls and maintain the integrity of communications. This document outlines our robocall mitigation practices, policies, and procedures to prevent the origination and transmission of unlawful robocalls through our network.

Policies and Procedures

1. Call Authentication and Verification:

- While Concept Interactive Inc. has not implemented the STIR/SHAKEN Trusted Calling framework, alternative measures are in place to monitor and address robocall activity.
- Calls originating from our network are monitored to detect patterns associated with unlawful robocalling activities.

2. Network Monitoring and Analysis:

- Real-time monitoring tools are utilized to identify suspicious calling patterns and high call volumes indicative of robocalling.
- Regular audits of call traffic ensure compliance with applicable regulations and detect anomalies that may suggest fraudulent activities.

3. Customer Onboarding and Vetting:

- Comprehensive vetting processes are in place to verify the legitimacy of customers and their intended use of services.
- Customers must adhere to our Acceptable Use Policy, which prohibits illegal robocalling activities.

4. Complaint Management and Resolution:

- A dedicated process is established for handling complaints related to robocalls.
- Complaints are thoroughly investigated, and corrective actions are taken to address verified issues promptly.

5. Proactive Mitigation Measures:

- Outbound traffic is monitored for unusual calling patterns, such as high-frequency short-duration calls or spoofed caller IDs.
- Immediate action, including service suspension or termination, is taken against customers found to be engaging in illegal robocalling activities.

6. Coordination with Regulators and Authorities:

- Concept Interactive Inc. cooperates fully with regulatory bodies and law enforcement agencies to address illegal robocalls.
- Relevant data and call records are provided upon request to support investigations.

7. Employee Training:

- Staff members are trained regularly on policies, tools, and techniques for identifying and mitigating robocall activity.
- Awareness programs ensure that employees remain vigilant and informed about evolving robocall schemes and prevention strategies.

8. Technology Implementation:

- Advanced analytics tools are employed to analyze traffic patterns and identify potential violations.
- Updates to systems and processes are regularly reviewed and enhanced to align with the latest best practices.

9. Use of a Voice Provider:

- Concept Interactive Inc. utilizes a cloud communications company as its voice provider. This provider offers programmable communication tools for making and receiving phone calls, sending and receiving text messages, and performing other communication functions via web service APIs.
- The voice provider's services are leveraged to maintain reliable and efficient communication while implementing measures to mitigate robocalls effectively.

Compliance and Reporting

- Concept Interactive Inc. maintains records of its robocall mitigation efforts, including logs of network monitoring activities, customer vetting results, and complaint resolutions.
- Periodic reports are submitted to regulatory authorities as required, demonstrating adherence to mitigation policies.

Contact Information

For questions or further information regarding our Robocall Mitigation Plan, please contact:

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Acknowledgment

This Robocall Mitigation Plan reflects our commitment to combatting illegal robocalls and maintaining the trust of our customers and regulatory partners. We will continue to evolve our strategies and practices to address emerging threats and remain compliant with industry standards.