

Robocall Mitigation Plan for Marketcall

1. Business Overview

Marketcall operates as an affiliate network focused on generating high-quality leads through inbound calls. These calls originate from carefully designed landing pages or directly from digital advertising campaigns managed by both our affiliates and in-house marketing team. We exclusively handle U.S. domestic traffic, ensuring strict adherence to all local regulations. Our primary role is that of an **aggregator**, connecting inbound calls with client call centers for optimal lead conversion and service delivery.

2. Call Verification Practices

To maintain the highest standards of legitimacy for inbound calls, Marketcall has implemented a robust verification system:

- **Premoderation of Affiliates:** Before launching campaigns, all affiliates must submit their landing pages and advertisements for a thorough review process. This ensures compliance with our quality and regulatory standards.
- **Traffic Monitoring:** We analyze key metrics such as call conversion rates, average call duration, and hourly call volume. This data helps us identify irregularities or suspicious activity that could indicate potential non-compliance.
- **Blocking Suspicious Numbers:** Upon detecting unusual activity or patterns, we promptly block any associated numbers to prevent further issues and maintain the integrity of our network.

Additionally, Marketcall employs real-time monitoring systems to ensure swift identification and mitigation of any anomalous call traffic.

3. Partner and Client Compliance

Marketcall enforces strict compliance measures for both affiliates and clients to safeguard against illegal practices:

- **Affiliate Policies:** All affiliates are required to adhere to comprehensive policies prohibiting the origination of illegal robocalls or any activity that contravenes FCC regulations.
- **Client Agreements:** Contracts with our clients explicitly mandate compliance with FCC robocall mitigation rules, ensuring mutual accountability.

- **Responsibility for Inbound Calls:** Our clients primarily handle inbound calls, and while we ensure compliance on our end, we clarify that outbound call activities are the responsibility of the client.

Marketcall also provides clear terms of service to affiliates and clients, outlining acceptable use policies and consequences for violations, including service suspension or termination.

4. Infrastructure and Vendor Compliance

Our infrastructure is designed to ensure compliance while providing seamless call handling:

- **Vendor Compliance:** We rely on Twilio and Sinch, trusted providers of call infrastructure, who have been verified as compliant with STIR/SHAKEN requirements.
- **In-House Infrastructure:** Marketcall operates its own **Asterisk PBX system**, which enhances our ability to manage, track, and optimize call routing.
- **No Additional Vendors:** Beyond Twilio and Sinch, Marketcall does not depend on other vendors for call handling, simplifying our compliance verification processes.

Marketcall routinely verifies that its infrastructure and third-party vendors adhere to all relevant standards and regulations.

5. Handling of Complaints and Tracebacks

Marketcall is committed to full transparency and cooperation in addressing complaints and traceback requests:

- **Complaint Response:** All robocall-related complaints are given top priority. We conduct thorough investigations and provide detailed information to law enforcement or regulatory authorities as needed.
- **Designated Compliance Officer:** A dedicated compliance officer oversees all compliance-related activities, ensuring timely responses to traceback requests and proactive mitigation of issues.

In cases of suspected illegal robocalls, Marketcall collaborates with the FCC, law enforcement, and traceback consortia to identify and resolve issues effectively within the required timeframe.

6. Know-Your-Upstream Providers

We take measures to ensure the compliance of our upstream providers:

- **Verification:** Both Twilio and Sinch have been confirmed to comply with STIR/SHAKEN standards, providing a reliable foundation for our call infrastructure.
- **Ongoing Due Diligence:** We will request compliance documentation from Twilio and Sinch regularly and conduct annual reviews of their adherence to regulatory requirements.
- **Traffic Monitoring:** By monitoring call routing patterns, we can detect and address irregularities that may indicate upstream non-compliance.

Marketcall includes specific terms in agreements with upstream providers requiring cooperation in traceback investigations and compliance with FCC requirements.

7. Traffic Monitoring and Reporting

Marketcall actively monitors all traffic to ensure compliance and quickly address any concerns:

- **Anomaly Detection:** Conversion rates, call durations, and traffic volumes are continuously analyzed to flag illegal activities or suspicious patterns.
- **Reporting Mechanisms:** If illegal traffic is identified, we promptly report it to the relevant authorities or regulatory bodies to prevent recurrence and maintain network integrity.

Marketcall uses advanced call analytics and employs blacklisting and whitelisting mechanisms to further enhance traffic monitoring and mitigate risks.

8. Education and Updates

Marketcall is dedicated to ongoing education and adapting to regulatory changes:

- **Affiliate Training:** We provide comprehensive training to our affiliates, equipping them with the knowledge and resources to comply with robocall laws and best practices.
- **Regulatory Monitoring:** A designated team member monitors FCC updates, public notices, and industry changes to ensure our practices remain compliant.
- **Policy Updates:** Internal policies are reviewed and revised as necessary to align with new regulations, ensuring continued compliance and operational excellence.

We also maintain open communication with affiliates and clients, providing regular updates and guidance on evolving compliance requirements.

Marketcall is deeply committed to upholding FCC regulations and preventing illegal robocalls within our network. By leveraging robust verification practices, proactive monitoring, and strong partnerships, we ensure the integrity of all calls routed through our platform. This Robocall

Mitigation Plan represents our dedication to compliance and our ongoing efforts to adapt to industry standards.

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