

Higher Response Marketing Inc.
Robocall Mitigation Plan
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Introduction

Pursuant to 47 C.F.R. § 64.6305, Higher Response Marketing Inc. (“The Company”) submits this Robocall Mitigation Plan outlining its implementation of the STIR/SHAKEN call authentication framework and the policies, practices, and procedures used to prevent illegal robocalls. The Company may revise or enhance any portion of this plan as needed to reflect operational, regulatory, or business changes.

STIR/SHAKEN Compliance

Higher Response Marketing has implemented STIR/SHAKEN in partnership with a designated STI-Certificate Authority (STI-CA). The network passes all received STIR/SHAKEN tokens without alteration, and we retain the ability to block unsigned or improperly signed calls.

Attestation Policy:

- Attestation A: Issued only when DIDs are purchased directly from us.
- Attestation B: Issued when the customer provides verifiable proof of DID ownership from a recognized telecom carrier.
- Attestation C: Not issued under any circumstances.

Customer Consent, Telemarketing Restrictions & Prohibited Traffic

Higher Response Marketing maintains verification procedures addressing customer consent requirements, telemarketing and TCPA restrictions, and prohibited traffic categories.

Upstream Provider Vetting

We follow a formal vetting and review process for all upstream providers—entities that deliver traffic to us for termination or transit. The Company confirms all upstream providers are registered in the FCC Robocall Mitigation Database. We do not accept voice traffic from unregistered providers and we comply with all upstream KYC requirements.

Customer Vetting & KYC Procedures

Higher Response Marketing follows the caller ID authentication best practices recommended by the NANC Call Authentication Trust Anchor Working Group.

We verify:

- Customer identity
- Right to use calling numbers
- Service address
- Credit history
- Authentic and lawful calling campaigns

For business customers, the Company also requires and validates business incorporation documents and operational legitimacy.

Call Analytics & Traffic Monitoring

Higher Response Marketing uses VOS 3000 V8 along with real-time call analytics tools to monitor all outbound traffic, identify indicators of unlawful robocalling, and take immediate action when suspicious activity is detected.

Traceback & Enforcement Cooperation

The Company has designated paul@hrmarketing.biz as its dedicated traceback contact. We respond to ITG requests within 24 hours and provide necessary information to law enforcement and regulatory agencies upon valid written request.

Contractual Compliance Requirements

Customer agreements expressly prohibit illegal robocalls. Violations result in warnings, suspension, or termination. Upstream providers must maintain reasonable Robocall Mitigation Plans, including customer vetting and analytics.

Confidentiality

Higher Response Marketing requests that the FCC treat its unredacted Robocall Mitigation Plan as CONFIDENTIAL. A redacted version will be submitted for public posting.