



Robocall Mitigation Policy

I. Overview

Bonterra, LLC (“Bonterra”) is an online software platform doing business as “Every Action” which enables nonprofits, political organizations, political campaigns, or political candidates to utilize its software to place Voice Over Internet Protocol (“VoIP”) telephone calls from a pre-set list of individuals maintained by the client through a third-party VoIP provider.

Bonterra utilizes a third party to provide the VoIP services, including to enable the VoIP and digitize the call. As such, Bonterra is not a “voice services provider” subject to the STIR/SHAKEN framework under 47 C.F.R. § 64.6300(n)(1). Bonterra submits this mitigation policy in the interest of transparency and assisting its third-party provider, Bandwidth, Inc. (FCC Registration No. 0015443773), in its compliance with the STIR/SHAKEN framework.

II. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

Bonterra utilizes the mitigation technique of “Know Your Customer.” Bonterra is a small provider of donor engagement, supporter engagement, program management, and corporate social responsibility tech solutions that accelerate the impact of social good organizations. Bonterra’s “EveryAction” donor- and volunteer-engagement platform is exclusively for the nonprofit use of Bonterra’s clients. Clients using the platform dial numbers identified by the client to conduct exclusively nonprofit calling or texting campaigns, and all such calls or texts originate from a telephone number that is owned and maintained by the client. All of Bonterra’s clients are subject to its Terms of Use and Acceptable Use Policy, which includes the limitation that all calls must be made for a non-profit purpose and use an originating telephone number with a

Caller ID that traces to the client. Each client must provide a physical address and name and



contact information for at least one individual authorized to act on behalf of the client and who is responsible for use of the Bonterra platform. Bonterra verifies the non-profit status of every entity that utilizes its platforms. We do not accept customers who operate for a commercial, forprofit purposes or clients that are engaged in telemarketing in any way. Bonaterra monitors for excessive call and text volume to identify possible misuse or impermissible commercial telemarketing.

III. Commitment to Respond Fully and in a Timely Manner to all Traceback Requests and to Cooperate With Investigating and Stopping Illegal Robocallers

Bonterra has never received a traceback request. If we do, we will respond immediately, investigate the source, and suspend service until the source is discovered. Bonterra will cooperate with any request from the FCC, law enforcement, and the industry traceback consortium to investigate and stop any illegal robocallers that use its service to originate calls.

