

Robocall Mitigation Compliance with TRACED Act

- BCM One Cloud Communications, LLC

BCM One Cloud Communications, LLC a voice service provider (the “Company”), submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to Section 64.6305 of the FCC’s rules.

A list of the Company’s Principals, Affiliates, Subsidiaries and Parent Companies can be found in the Appendix.

STIR/SHAKEN

The Company has fully implemented STIR/SHAKEN. All calls that the Company originates are compliant with Sections 64.6301(a)(1) and (2) of the Commission’s rules.

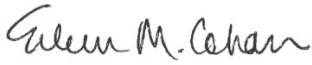
TRACEBACK

The Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. The Company will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.

ENFORCEMENT

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. On May 16, 2025, the FCC issued a Cease and Desist Letter to Company. In the letter, the FCC indicated that the Company was “originating apparently illegal traffic.” The Company timely responded to the letter. No final determination has been issued. The Company has never been prohibited by the Commission from filing in the Robocall Mitigation Database.

I, Eileen Cohan, submit this certification on behalf of the Company which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.



_____(signature)

September 16, 2025

_____(date)

MITIGATION PROGRAM

As detailed below, the Company has taken specific reasonable steps to avoid the origination, carrying, or processing of illegal robocall traffic. All voice traffic that originates on our network is subject to the below Robocall Mitigation Plan.

The Company monitors its network to identify suspicious traffic patterns, and has implemented anti-spoofing tools on its network to identify and block illegal calls and traffic. The Company uses tools purchased from trusted third parties, including: MaxMind and Persona (as further explained below), Somos (from whom the Company purchases a commercial DNO list) and YouMail Watch Call Detail Record service (“YouMail CDR”) (a traffic monitoring service). Based on information the Company receives from ITG, YouMail CDR, Somos and other carrier information, the Company maintains an internal Do Not Originate (“DNO”) list. The Company periodically updates its tools and its DNO list to detect and include invalid phone number formats, area codes, and unassigned number blocks. The Company also utilizes internal data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company’s Know Your Customer (KYC) requirements include:

- Limiting a customer’s capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- Vetting all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees.

The Company severely limits the capabilities of new accounts until the KYC processes are complete. Additionally, as part of its KYC process for onboarding new direct customers, the Company uses two identification verification tools, MaxMind and Persona, which conduct verification checks across government ID databases to confirm the identity of customers in order to combat illegal calls. The Company also utilizes the YouMail CDR service to monitor traffic in an effort to improve its robocall/anti-spoofing mitigation efforts.

The Company has an Upstream Provider Policy, pursuant to which, the Company will confirm that its upstream providers are appropriately listed in the FCC’s RMD and have not been delisted pursuant to an enforcement action.

The Company’s service agreements contain acceptable use and traffic integrity terms that prohibit the use of Company services for illegal purposes. Pursuant to the terms of our service agreements, the Company may terminate services for fraudulent use of our services, for illegal, improper or unauthorized use of services, and/or for violations of any laws, rules and regulations applicable to the use of Company services. Additionally, the Company may block the originating number(s), terminating numbers(s), trunk(s) or the customer, including termination of customer relationships to prevent robocalling, invalid originating number or spoofed origination number transiting the Company’s networks.

The Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

The Company reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.

APPENDIX

BCM One, Inc.

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Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

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