



Phone: 561-571-5640 | Web: MaxRevOnline.com
Address: 7750 Okeechobee Blvd # 4-302
West Palm Beach, FL 33411

ROBOCALL MITIGATION PLAN

EXECUTIVE SUMMARY

MaxRev Interactive, Corp is committed to preventing illegal voice and robocall traffic from originating on our network by implementing comprehensive monitoring and mitigation practices in accordance with FCC regulations. We serve small and medium-sized businesses throughout Florida with fewer than 100 customers who utilize our VoIP communication services exclusively for legitimate business purposes through IP-based phone system implementations.

COMPANY ROLE IN CALL CHAIN

Primary Role: Voice service provider serving end-user businesses

Secondary Roles: None

Customer Base: Small and medium-sized businesses in Florida (fewer than 100 customers)

Service Type: IP-based business phone systems and VoIP communication solutions

Network Model: Wholesale carrier partnerships for call origination and termination

KNOW YOUR CUSTOMER (KYC) PROGRAM

Customer Qualification Process

Customer Vetting for New and Renewing Customers:

MaxRev Interactive, Corp implements comprehensive customer vetting procedures to prevent our services from being used for illegal robocalling activities.

New Customer Onboarding:





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Before activating service for any new customer, MaxRev Interactive performs the following verification steps:

- Business identity verification through state business registration records (Florida Division of Corporations Sunbiz.org or equivalent for out-of-state entities)
- Physical business address verification (no PO Box-only addresses for primary business location)
- Principal contact identity verification including government-issued identification
- Business website and online presence review
- Verification that the prospective customer's stated business purpose is consistent with legitimate voice communication needs
- Review of intended call volume and calling patterns to identify potential high-volume or suspicious use cases
- Direct communication with business principal via verified phone number

Contractual Provisions with Customers:

All customer service agreements include provisions that:

- Prohibit the use of MaxRev Interactive services for illegal robocalling, spoofing, or fraudulent calls
- Prohibit telemarketing calls that violate the Telephone Consumer Protection Act (TCPA) or Telemarketing Sales Rule (TSR)
- Require customers to maintain and honor do-not-call lists
- Reserve the right to immediately terminate service for violations
- Require customers to provide accurate caller ID information
- Absolute prohibition on robocalling, autodialing, and unsolicited commercial communications
- Mandatory legitimate business use restrictions for all voice communications
- Immediate reporting obligations for suspicious or unauthorized calling activity
- Include indemnification for any illegal use of services

Renewing Customer Procedures:

- Annual comprehensive compliance verification and business license renewal confirmation
- Quarterly communication pattern analysis and usage review
- Regular updating of customer contact information and authorized personnel
- Annual re-execution of service agreements with updated compliance requirements
- Ongoing monitoring of customer communication patterns for compliance verification





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Ongoing Customer Monitoring

MaxRev Interactive monitors existing customers through:

- Review of call detail records for unusual patterns (sudden volume spikes, high short-duration call ratios, complaints)
- Prompt investigation of any traceback requests or carrier complaints
- Annual customer information verification at service renewal
- Immediate investigation of any reports of suspicious activity
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ROBOCALL MITIGATION PROGRAM

Prohibited Activities

We maintain strict policies prohibiting:

- Robocalling or automated calling systems targeting consumers
- Unsolicited commercial communications or telemarketing
- Caller ID spoofing or manipulation practices
- Communications to Do Not Call Registry numbers
- Deceptive or fraudulent communication activities
- Harassment, abuse, or nuisance communications

Technical Monitoring and Controls

Automated Detection Systems:

- High-volume calling pattern alerts (>50 calls/hour per customer)
- Short-duration call analysis for robocall pattern detection
- Sequential dialing pattern identification systems
- Unusual calling schedule monitoring (after hours, holidays)
- Geographic anomaly detection for destination patterns
- Call completion rate analysis for suspicious activity



Call Authentication Measures:

- Verification of outbound communications from authorized numbers only
- Continuous monitoring for caller ID manipulation attempts
- Regular validation of number assignments and usage patterns
- Coordination with wholesale providers for authentication services

Network Security Controls:

- Multi-factor authentication for system access
- Regular security updates and credential management
- Continuous monitoring for unauthorized access attempts
- Geographic and rate-limiting controls to prevent abuse

Investigation and Response Procedures

Upon detection of suspicious activity:

1. **Immediate Response:** Suspend suspect traffic and notify customer
2. **Investigation:** Analyze call records and customer consultation
3. **Documentation:** Complete incident documentation and findings
4. **Corrective Action:** Implement enhanced monitoring and prevention measures
5. **Follow-up:** Ongoing compliance verification and monitoring

STIR/SHAKEN IMPLEMENTATION STATUS

Current Status: Not Implemented - Upstream Provider Dependency

STIR/SHAKEN Exemption Explanation: MaxRev Interactive, Corp operates under 47 CFR § 64.6304(a)(1)(iii) as a small provider with fewer than 100,000 subscriber lines relying on wholesale carrier services. We do not have direct control over the network infrastructure necessary for independent STIR/SHAKEN implementation. Our wholesale providers provide comprehensive STIR/SHAKEN authentication services including call signing, certificate management, and attestation level assignment for all traffic originating from our customer base. This arrangement ensures full compliance with STIR/SHAKEN requirements while

allowing small providers like MaxRev Interactive to focus on customer service and business communication solutions.

Upstream Provider Coordination:

- Upstream providers maintains current STIR/SHAKEN compliance and authentication capabilities
- Regular verification of authentication services provided through our carrier partnership
- Active coordination on certificate management and call authentication protocols
- Continuous monitoring of attestation levels applied to customer communications through Upstream Providers' network

Know Your Upstream Provider Program:

- Verification of carrier RMD registration and compliance status
 - Assessment of carrier robocall mitigation practices and policies
 - Contractual requirements for authentication and compliance services
 - Regular performance and compliance monitoring of carrier relationships
 - Detailed documentation of all upstream provider agreements
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CALL ANALYTICS AND MONITORING

Monitoring Systems

Real-Time Analytics:

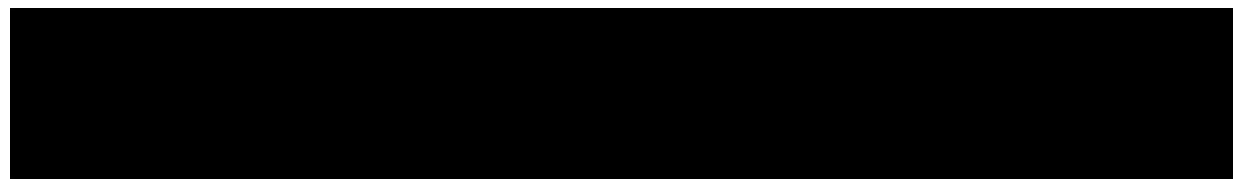
- Comprehensive call pattern analysis and anomaly detection
- Volume threshold monitoring with automated alerting
- Duration pattern analysis for potential robocall identification
- Geographic destination analysis for unusual patterns

Third-Party Analytics and Monitoring Tools:

MaxRev Interactive utilizes the following for call analytics and customer monitoring:



- **VoIP Innovations Portal:** Our wholesale carrier provides network-level analytics including call volume reporting, answer/seizure ratios, and call completion statistics through their customer portal
- **3CX Management Console:** Call detail records, extension activity, and system logs are monitored through the 3CX PBX administrative interface for each customer deployment
- **Internal Review Processes:** Manual review of CDRs and customer activity is performed by MaxRev Interactive staff; we do not currently utilize additional third-party robocall analytics vendors beyond our wholesale carrier's integrated tools



Manual Review Procedures

- Daily automated alert review and investigation
 - Monthly comprehensive compliance assessment
 - Quarterly system effectiveness evaluation and improvements
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TRACEBACK RESPONSE CAPABILITIES

24-Hour Response Commitment

MaxRev Interactive commits to responding to all traceback requests from the FCC, law enforcement agencies, and registered traceback consortiums within 24 hours of receipt.

Response Process

1. **Receipt and Acknowledgment:** Immediate confirmation of traceback request



2. **Investigation:** Comprehensive call record analysis and customer identification
3. **Documentation:** Complete call path information and customer details
4. **Response Delivery:** Detailed response with all requested information
5. **Follow-up:** Implementation of any recommended corrective actions

24-Hour Contact Information

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 - **Email:** support@maxrevonline.com
 - **Phone:** 561-571-5640 (24-hour monitoring)
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EMPLOYEE TRAINING AND COMPLIANCE

Training Program

Initial Training: All relevant personnel receive FCC compliance training within 30 days

Annual Updates: Comprehensive training on regulatory changes and best practices

Ongoing Education: Quarterly updates on robocall mitigation techniques

Documentation: Complete training records maintained for all relevant staff

Training Topics:

- Federal robocall regulations and enforcement mechanisms
 - Customer monitoring and suspicious activity identification
 - Traceback request recognition and response protocols
 - Incident reporting and escalation procedures
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RECORDKEEPING AND DOCUMENTATION

Records Maintained

- Customer service agreements and robocall prohibition acknowledgments
- Call detail records (maintained for 18-month requirement)



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- Employee training documentation and certifications
- Incident response records and investigation findings
- Traceback request responses and follow-up actions
- Wholesale provider agreements and compliance documentation

Data Security

- Secure, encrypted storage for all sensitive records
 - Access controls limiting record access to authorized personnel
 - Regular backup and disaster recovery procedures
 - Full compliance with data protection regulations
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REGULATORY COMPLIANCE AND REPORTING

Compliance Monitoring

- **Daily:** Automated system monitoring and alert response
- **Monthly:** Comprehensive compliance assessment
- **Quarterly:** Policy effectiveness review and updates
- **Annually:** Complete audit of robocall mitigation measures

Regulatory Cooperation

- Proactive reporting of identified robocall activity within 15 days
 - Full cooperation with law enforcement and regulatory investigations
 - Regular compliance reporting upon regulatory request
 - Active participation in industry traceback initiatives
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CONTACT INFORMATION

Primary Robocall Mitigation Contact



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