

OneDais Robocall Mitigation Plan

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I. Introduction

OneDais LLC ("OneDais") is a voice service provider of omni-channel communication services, including VoIP and SMS/text. This Robocall Mitigation Plan (RMP) outlines the reasonable steps OneDais has taken and will continue to take to prevent the origination and transmission of illegal robocalls on its platform. This plan is designed to comply with the Federal Communications Commission's (FCC) requirements under the TRACED Act and relevant regulations, including those concerning the Robocall Mitigation Database.

OneDais is a non-facilities-based reseller of voice services. We do not originate calls on our own network and currently do not have the infrastructure to implement STIR/SHAKEN. All calls originate from our underlying carriers, who are responsible for the implementation of STIR/SHAKEN where applicable.

II. Commitment to Traceback and Law Enforcement

OneDais is committed to assisting in the fight against illegal robocalls. As such, the company will: (1) Respond fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium; (2) Retain detailed call records and other necessary information for a period of at least one year to facilitate traceback investigations; and (3) Cooperate with authorities in the investigation of illegal robocalling activities.

III. Robocall Mitigation Measures

OneDais has implemented and will continue to maintain the following reasonable steps to mitigate illegal robocalls.

A. Know-Your-Customer (KYC) Procedures

OneDais LLC recognizes its responsibility to vet and monitor all users. Our KYC procedures are designed to ensure that both new and existing customers are legitimate entities with lawful use cases.

1. **Customer Vetting & Re-Verification:** New customers must undergo a mandatory vetting process before service activation. This includes verifying the legal business name, physical address, and Tax ID (EIN), as well as evaluating the intended use case for the platform to ensure it aligns with legal telemarketing and communication standards. Existing customers are subject to periodic re-verification. We conduct annual reviews of account profiles to ensure business information remains current and

that the customer's actual usage continues to match their stated use case during their initial vetting process. Any material change in a customer's service level or traffic volume triggers an immediate KYC refresh to confirm that the changes do not indicate a shift toward prohibited activities.

2. **Third-Party Analytics Integration:** To ensure robust mitigation, OneDais LLC utilizes industry-leading third-party analytics vendors. We rely on software provided by Bandwidth (our primary upstream provider) and 2600Hz to monitor all outbound voice traffic in real-time.
3. **Analytics Capabilities:** These third-party platforms provide detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or listed on a **Do Not Originate (DNO)** list
4. **Terms of Service:** Our Terms of Service explicitly prohibit the use of our services for illegal or abusive purposes, including illegal robocalling, and spamming. Violation of these terms results in immediate service suspension or termination without notice.
5. **Continuous Usage Monitoring:** We employ automated and manual processes to monitor customer usage patterns for suspicious activity that may indicate illegal robocalling. This includes a review of high-volume calling, call duration, and repeated short-duration calls.

B. Call Analytics and Blocking

OneDais relies on call analytics and blocking tools provided by its upstream voice service provider(s) to identify and mitigate illegal and unwanted robocalls. These upstream tools monitor calling patterns and traffic characteristics to detect potentially unlawful activity, including high-volume or anomalous calling behavior, low call completion rates, spoofed or invalid caller ID information, and traffic associated with consumer complaints or traceback requests.

When potentially illegal robocall traffic is identified, OneDais works with its upstream provider(s) to take appropriate mitigation actions, which may include blocking or filtering calls, suspending traffic pending investigation, or requiring customer remediation. OneDais responds promptly to traceback requests and cooperates with upstream providers and industry partners to prevent unlawful robocalls while minimizing the risk of blocking lawful calls.

C. STIR/SHAKEN Implementation

OneDais operates as a reseller of voice services without its own switching or transmission infrastructure. As such, we do not originate calls directly on any owned network and lack the technical resources to deploy STIR/SHAKEN. All call origination is handled by our upstream carriers that are fully STIR/SHAKEN compliant. Because we verify our customers' identities

and their authority to use their numbers, our traffic is passed to these carriers with the high level of confidence necessary for them to apply accurate attestation.

E. Customer Education and Support

We provide our customers with information and resources on best practices for legitimate calling and messaging, and on the legal and regulatory requirements for telemarketing and customer outreach. We offer a clear and accessible process for customers to report issues and for us to investigate and take action on reports of illegal or unwanted calls originating from our network.

IV. Compliance and Enforcement

- **Internal Audits:** OneDais will conduct regular internal audits of its robocall mitigation program to ensure its effectiveness and compliance with all FCC regulations.
- **Plan Updates:** This plan will be reviewed and updated annually, or as needed, to reflect changes in technology, FCC regulations, or our business practices.
- **Penalties:** OneDais will take immediate action, including the suspension or termination of service, against any customer found to be in violation of our Terms of Service by originating or facilitating illegal robocalls.

V. Certification

OneDais LLC certifies that the information in this plan is true and accurate. We further certify that we are taking reasonable steps to prevent the origination of illegal robocall traffic and that we comply with all applicable FCC rules and regulations.