

VOICELOGIC
ROBOCALL MITIGATION PLAN
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I. Background

Under the authority Congress granted the Federal Communications Commission ("FCC" or "Commission") in the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the Commission has adopted rules requiring voice service providers, like Voicelogic, to implement STIR/SHAKEN procedures in our network and campaign conduct.

Voicelogic is dedicated to stopping illegal calls from originating on its network and undertaking commercially reasonable efforts to monitor client campaign activities to eliminate illegal campaign events.

This document outlines Voicelogic's Robocall Mitigation plan.

II. Voicelogic's Know Your Customer ("KYC") Standards.

As part of its customer-onboarding process, Voicelogic undertakes various commercially reasonable precautions to verify a given customer's identity as part of entering into a formal written agreement. No anonymous accounts are allowed. Voicelogic investigates and vets the prospective customer's background, such as checking for a company website, duration of business operation, and other indicators for confirmation of a legal, operating business. Among other data points collected that are verified, Voicelogic gathers the following customer-identifying facts, which it typically validates before providing any of its services:

- Customer business name,
- physical business location,
- contact person(s), and
- Email address.

Included is also a live phone consultation with every client, to ensure compliance, to ensure their business is real, and begin a business relation as part of the KYC process, and to ensure they are a representative of the company.

III. Voicelogic's Acceptable Use Policy

As part of its customer-onboarding process, Voicelogic's customers contractually agree to various terms and conditions, including a commitment to comply with Voicelogic's "Terms of Service". As such Voicelogic prohibits:

- Using the Services to engage in any activities that are illegal, abusive, false, fraudulent, deceptive or misleading, or any activity that exploits, harms, or threatens to harm anyone.
- Engaging in any unlawful activities using the Services, including, without limitation, any activities that violate laws applicable to advertising, electronic communications, and telemarketing, including, but not limited to,
 - Section 5 of the FTC Act (15 U.S.C. § 45),
 - the CAN-SPAM Act (15 U.S.C. §§ 7701-7713),
 - the Telemarketing Consumer Fraud and Abuse Prevention Act (15 U.S.C. §§ 6101-6108),
 - the Federal Trade Commission Telemarketing Sales Rule (16 C.F.R. § 310 et seq.),
 - the Telephone Consumer Protection Act (47 U.S.C. §§ 227),
 - the Federal Communications Commission regulations (47 C.F.R. 64.1200 et seq.) and orders implementing the Telephone Consumer Protection Act, and all federal and state Do Not Call and calling-time restriction laws and regulations.
- Using Voicelogic's Services in any way that fails to conform to any applicable industry guidelines and standards, including, Messaging Principles and Best Practices, Short Code Registry Best Practices.
- Creating a false identity, forged email address or header, phone number, or otherwise attempting to mislead others as to the identity of the sender/caller ID or the origin of a message or phone call.

Voicelogic will suspend and/or terminate all Services in the event of any such violation.

IV. Telephone Number Authorization and STIR-SHAKEN Capabilities

The Caller ID that each client uses for legal robocall, or call center service campaigns, are verified as belonging to the client, before any campaign can be initiated.

Message content is reviewed by Voicelogic employees, to check for scams, abuse, fraud, or inappropriate or illegal activity when using our services. All client message content is examined before clients are allowed to launch any type of campaign. Clients have no access to any Voicelogic servers. Only internal staff/ employees can load, setup, start, stop, the servers. Any changes or modifications to any new or existing calling campaign, can only be done by making such request to the Voicelogic tech staff. Any attempt to subvert our processes, the account will be cancelled. Voicelogic is not a self-serve lights-out service provider. There is a human involved in every step of the process.

V. DNC scrubbing procedure

Voicelogic subscribes to a DNC scrubbing service which is used to scrub client contact lists, before they are used on any client campaign. Voicelogic also maintains its own master kill list, to serve as a 2ndary inhouse DNC list, which can not be bypassed by our clients.

VI. Commitment to Traceback Cooperation

Voicelogic commits to timely cooperating with and responding to Traceback requests from traceback investigations, and other valid law enforcement and government demands, subpoenas, and other valid legal processes.

Voicelogic will dedicate sufficient resources to provide prompt and complete responses to such requests.