

Robocall Mitigation Plan – First Outcomes Inc.

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Company Name: First Outcomes Inc.

1. Contact Information

Primary Robocall Mitigation Contact

- **Name:** Seetha Ganesan, Chief Technology Officer
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Official Company Address

- **Dinesh Gambhir**
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Nesconset, NY 11767

Designated Contact for Compliance and Traceback Inquiries

- **Email:** sganesan@firstoutcomes.com
(Monitored 24/7 for FCC, ITG, and law-enforcement inquiries)

2. Business Information

Legal Entity

- **First Outcomes Inc.**

Company Principals

- **Dinesh Gambhir, PhD – Chief Executive Officer**
- **Seetha Ganesan – Chief Technology Officer**

Subsidiaries, Affiliates, or Parent Companies

- None

3. STIR/SHAKEN Implementation

First Outcomes Inc. does not operate or control the voice network infrastructure necessary to implement STIR/SHAKEN directly and does not authenticate calls directly. All outbound calling traffic originates through our upstream carrier, Bandwidth.com, which performs STIR/SHAKEN authentication/attestation for calls originated using its network. Accordingly, First Outcomes Inc. is unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN.

4. Robocall Mitigation Program

Because First Outcomes does not operate a voice network and does not authenticate calls directly, all outbound traffic is originated through **Bandwidth.com**, which performs STIR/SHAKEN attestation. First Outcomes implements the following technical measures to prevent illegal robocall origination:

- **Caller ID validation** for all customer-configured caller IDs; blocking of invalid, unassigned, or mismatched ANIs prior to campaign activation.
- **Pre-vetting of all call use-cases, scripts, and campaigns.** Customers cannot self-create arbitrary campaigns; First Outcomes reviews and approves all call content and call flows before activation.
- **Real-time traffic monitoring** for volume spikes, CPS anomalies, short-duration bursts, unusual patterns, or behavior inconsistent with permitted healthcare use-cases.
- **Automated and manual threshold alerts**, including abnormal retry patterns, call completion rates, and per-clinic traffic deviations.
- **Immediate suspension** of suspicious traffic, campaigns, or accounts pending investigation.
- **Use of a single upstream provider**, Bandwidth.com, ensuring consistent STIR/SHAKEN treatment and eliminating multi-carrier routing complexity.

3.2 Know Your Customer (KYC) Procedures

First Outcomes restricts service **exclusively to established healthcare providers** (e.g., FQHCs, specialty groups, hospital-owned practices). All customers must pass a rigorous KYC process before any calling capability is enabled:

- Verification of **business identity**, including corporate formation documents, EIN/Tax ID, and government-issued identification for authorized signatories.

- **Proof of physical address** and operating location(s).
- Validation of **legitimate healthcare activity** through website review, NPI verification, provider roster checks, and cross-matching with state licensing information.
- Confirmation of intended **use-case category** (appointment reminders, care coordination calls, follow-up instructions, patient navigation, etc.).
- Execution of a **service agreement that prohibits illegal robocalling, spoofing, outbound marketing**, or any high-risk or prohibited call types.
- Review of clinic/organization call volumes, workflows, and historical call patterns to confirm alignment with lawful healthcare communications.

3.3 Ongoing Customer & Campaign Review

Ongoing monitoring ensures continuing compliance with FCC rules and healthcare-only constraints:

- **Periodic audits** of call pattern behavior, including frequency, duration, and patient-contact ratios.
- **Re-validation** of customer information upon renewal, material changes to operations, or upon request.
- **Post-activation reviews** of all campaigns, including script accuracy, use-case alignment, and log sampling.
- **Immediate suspension or termination** of any campaign or customer account exhibiting unlawful, suspicious, or non-healthcare call behavior.
- **Mandatory correction and compliance notices** when behavior deviates from approved use-cases.
- **Reporting of confirmed violators** to appropriate authorities and the upstream carrier.

5. 4. Call Analytics and Vendor Usage

First Outcomes does not use a third-party analytics vendor at this time. All analytics are conducted through internal systems, including:

- **CDR pattern analysis**, volume deltas, retry analysis, and abnormal behaviors.
- **Anomaly detection**, including off-hour spikes, repeat-dial patterns, or unexpected call distributions.
- **Threshold-based alerts**, including maximum CPS, call failure ratio, and repeated early-hangup patterns.

- **Manual reviews** for any outliers or atypical customer behavior.

External analytics and traceback-enhancement services are under evaluation for future improvement.

6. 5. Reporting and Cooperation

First Outcomes cooperates fully with all regulatory and industry traceback and enforcement bodies, including:

- **FCC Enforcement Bureau**
- **Industry Traceback Group (ITG)**
- **Federal, state, and local law enforcement**

All traceback requests, FCC inquiries, or law-enforcement requests are responded to within **24 hours**.

7. 6. Internal Oversight

- **Compliance Officer:** Seetha Ganesan, Chief Technology Officer
- **Overall Accountability:** Centralized under the CTO, with direct involvement from the CEO and Security/Compliance team.
- **Monitoring:** FCC communications, traceback notices, and enforcement communications are monitored **daily** and acknowledged within 24 hours.
- **Documentation:** All mitigation actions, suspensions, and investigations are logged and retained.

8. 7. Conclusion

First Outcomes Inc. has corrected all deficiencies identified by the Enforcement Bureau by:

1. Updating its STIR/SHAKEN status to accurately reflect **upstream-based signing by Bandwidth.com**.
2. Accurately reporting prior **FCC enforcement actions**, including the prior removal and provisional reinstatement of our RMD filing.
3. Expanding and documenting our **KYC, campaign vetting, and mitigation procedures**, including healthcare-only use-cases and pre-approved scripts.

4. Aligning this Robocall Mitigation Plan fully with the **“Mitigation Certification” (Option 3)** in the RMD filing, as required for entities that do not perform STIR/SHAKEN themselves but implement robust mitigation steps.