

Company Overview + Robocall Mitigation Procedures + Certification

Company Overview:

mPulse Mobile Inc. is a voice service provider offering outbound calling services on behalf of clients. Enam Haque the Senior Director of Software Engineering serves as the primary contact for RMD compliance, with Dustin Coffman the Product Support Engineer L3 designated as the secondary contact.

Robocall Mitigation Policies and Procedures:

mPulse Mobile Inc. maintains the following internal policies and procedures to prevent illegal robocalls:

- **Customer Verification / KYC:** All clients requesting A-level attestation are verified through a Know Your Customer process. Verification includes collection of business registration information, contact details, and proof of ownership for the requested caller IDs.
- **TNLOA Verification:** A signed Telephone Number Letter of Authorization (TNLOA) is obtained from the client for all caller IDs to be used with A-level attestation. Supporting documentation, such as invoices or billing statements, is retained internally.
- **Attestation Assignment:** A-level attestation is assigned only to verified caller IDs. The assignment is documented in internal systems with operator notes and timestamps.
- **Monitoring & Auditing:** Call activity is continuously monitored for anomalies, high failure rates, or suspicious patterns. Any flags are reviewed by the compliance team, and corrective action is taken as necessary.
- **Incident Response / Traceback (ITG):** mPulse maintains a documented process to respond to traceback requests within 24 hours. All responses reference internal records, including TNLOAs and call logs.
- **Records Retention:** Internal documentation supporting these procedures, including TNLOAs, KYC records, call logs, and attestation assignment records, is retained in accordance with FCC requirements and internal policy.

Certification:

mPulse certifies that these procedures are implemented and maintained as described, reflecting reasonable measures to mitigate illegal robocall traffic.

