



Convoso Robocall Mitigation Plan Overview

Introduction

Convoso, Inc. ("Convoso" or "Company") maintains a thorough robocall mitigation program that works in concert with its compliance policies, procedures, employee training, and customer education initiatives. Robocall mitigation methods are incorporated into the Company's Know Your Customer (KYC) program and continue through the customer lifecycle with advanced internal and third-party analytics tools and capabilities. Using these tools, Convoso is able to detect and mitigate unlawful traffic.

Alignment with Regulatory Best Practices

Convoso's program aligns with the Commission's best practices as outlined in its January 6, 2026 Eighth Report and Order in CG Docket No. 17-59 as well as 47 CFR § 64.6305(a). This includes client contractual compliance requirements which are incorporated in the Convoso Services Agreement (CSA) and the CSA's Responsible Use & Compliance Policy. Convoso has fully implemented STIR/SHAKEN. It has obtained a STIR/SHAKEN certificate and authenticates calls originating from its platform.

Comprehensive Robocall Mitigation Strategy

Convoso has implemented a comprehensive robocall mitigation strategy to ensure compliance with FCC regulations and to prevent illegal telephone calls. The client onboarding process is a critical component of this strategy, involving thorough due diligence of each client. This process is designed to ensure that only legitimate companies are onboarded, thereby minimizing the potential for noncompliance. Convoso requires its customers to comply with all applicable laws and regulations, including relevant Do-Not-Call (DNC) registries.

Network Analytics to Monitor and Deter Illegal and Unwanted Robocalls

Convoso deploys internal and third-party network analytics tools to proactively detect, monitor, and mitigate illegal and unwanted robocalls as part of its broader compliance framework.

Convoso analyzes its real-time traffic patterns to identify anomalies, with cross-functional collaboration between technical, customer, legal and compliance teams to identify, investigate and address suspicious activity.

As a key component of its analytics efforts, Convoso utilizes monitoring provided by ZipDX to get near real-time insights into call traffic, call content, and suspicious behavior. This service provides risk scores for traffic and automated notifications that allow Convoso to appropriately respond in a timely manner. Additionally, Convoso collaborates with industry partners to help safeguard against identity and branding misuse.

Together, these network analytics solutions allow Convoso to continuously monitor its platform and partner networks for issues as part of its robocall mitigation strategy.

Post-Complaint Response Policies and Procedures

In the event Convoso receives a complaint or allegation regarding illegal or unwanted robocalls, the Company has an established and robust post-complaint response process.

Specifically, Convoso maintains a dedicated response process and resources for complaints from consumer and industry partners. The Company's policies require a thorough and expedient response to any complaint or legal request from a local, state or federal law enforcement or administrative agency. More information about law enforcement requests may be found at <https://www.convoso.com/legalnotices/>.

Additionally, the Company maintains a Supplemental Due Diligence policy that requires additional analysis of customers and their traffic when certain events occur that indicate a heightened risk of violating Convoso's policies and procedures, including when alerted by third-party analytics providers.

Response to Industry Traceback Group (ITG) and Legal Requests

Convoso is committed to providing a timely response and efficient cooperation. Convoso's policy requires that all traceback requests from the FCC, FTC, and other law enforcement agencies be responded to within 24 hours, or within any longer timeframe specified by the requester, ensuring that any potential issues are swiftly investigated and resolved.