

Brightflow Technologies Robocall Mitigation Plan

The following policies apply to all customers and prospective customers of Brightflow Technologies. These measures form our Robocall Mitigation Plan, ensuring illegal robocall traffic does not originate from our network:

1. Contract Requirements

Our agreements explicitly prohibit the transmission of illegal robocalls through any of our systems. They define specific requirements for metrics such as ASR and LCD. Customers violating these terms face immediate termination without prior notice. If Brightflow Technologies detects illegal traffic on our network, the customer forfeits confidentiality, and all relevant data will be shared with industry partners and law enforcement as required by regulations.

2. Customer Disclosures and Verification

All customers are required to provide detailed information about their operations, including:

Physical location

Contact personnel

State/country of incorporation or formation

Federal tax ID or an equivalent non-USA identifier

Customers must also disclose the nature of their business and the type of traffic they generate.

Brightflow Technologies thoroughly reviews and verifies all customer information before onboarding, ensuring compliance with our policies and an understanding of the traffic sourced from their systems.

3. Traffic Monitoring and Traceback

Brightflow Technologies actively monitors its network for suspicious activity. If robocall-like traffic is detected, we confirm its authorization (e.g., legal political campaigns, non-profits, reverse 911, or fully opted-in communications).

For any Traceback request regarding illegal robocalls:

Brightflow Technologies acts immediately to investigate.

Detailed explanations are required from the involved customer(s).

Corrective action must be taken promptly.

Failure to address issues results in immediate action to prevent recurrence. Brightflow Technologies ensures timely responses to all requests from authorities.

4. Policy Publication and Notification

This Robocall Mitigation Plan is published on our website and communicated proactively to all customers. Brightflow Technologies maintains a record of these notifications for accountability.

5. Foreign Traffic Compliance

Brightflow Technologies serves international customers who manage traffic originating from both domestic and international sources. Extra precautions are taken with non-USA customers to ensure compliance with this Robocall Mitigation Plan. All customer-provided information is verified before granting calling privileges.

6. Robocall Mitigation Database

All wholesale customers are required to register with the Robocall Mitigation Database. Customers