

Robocall Mitigation Plan – Bull City Financial Solutions

Bull City Financial Solutions is a voice service provider that places outbound calls on behalf of its clients, based on data those clients provide. We do not originate calls to the public for our own purposes, and we do not provide VoIP access to third parties.

We use a third-party outbound calling platform, TCN, to execute all outbound call campaigns. TCN provides STIR/SHAKEN support and analytics tools to help identify and prevent illegal call behavior. Campaigns are based on account data received directly from our clients and are limited in scope to necessary business communications, such as billing notifications and account updates.

Our back-office voice service provider, Cloudli, is used solely for internal office communications and is not used for any outbound campaigns.

Reasonable Steps to Prevent Illegal Robocalls:

- All calls are made using data provided by contracted clients. We do not engage in cold calling or marketing-based campaigns.
- Call lists are generated internally and outbound campaigns are managed only by authorized personnel.
- We rely on TCN's analytics and compliance tools to detect and reduce the likelihood of improper call behavior.
- We do not spoof caller ID. All outbound numbers are properly provisioned and linked to our business.

Know-Your-Customer Practices:

- We only work with known, vetted clients under formal agreements.
- We do not offer open or self-service access to our calling systems. All campaigns are internally managed.
- We monitor campaign behavior in conjunction with TCN and investigate any suspicious patterns or complaints.

Third-Party Analytics Vendor:

Yes, we use TCN for analytics and robocall mitigation tools as part of our outbound campaign infrastructure.

We will respond within 24 hours to any traceback requests from the Commission, law enforcement, or the industry traceback consortium, and we are committed to cooperating fully with such investigations.