

Robocall Mitigation Plan for Voter Science, LLC

Introduction

This plan outlines measures that Voter Science, LLC will implement to prevent and mitigate unlawful robocalls and ensure regulatory compliance. Voter Science, LLC is a political technology service provider that provides data and technology services to campaigns, PACs and party organizations in-order-to facilitate voter outreach and engagement. Part of these services can involve acting as a voice service provider (VSP) by providing call center solutions to our clients as part of their voter engagement efforts. Our goal is to provide these VSP call center services in a way that protects voter data while upholding legal and regulatory compliance of our voice services. As part of this effort, Voter Science, LLC will take several steps to identify and prevent unlawful robocalls as part of VSP services as outlined in the following sections.

Regulatory Compliance

Voter Science, LLC commits to complying with applicable regulatory compliance requirements including:

- Federal Trade Commission (FCC) rules and guidelines
- The TRACED Act
- Implementing STIR/SHAKEN framework for caller ID authentication

Robo-dial Detection and Prevention Strategies

While Voter Science, LLC does offer robo-dial services to clients, we do not provide these services via any managed infrastructure but rather rely on third-party services that manage the entire process of set up and sending automated robo-dials on our clients' behalf. These third-party providers utilize different compliance methods including using phone number validation services to ensure that dialed numbers are indeed landlines and not cellular numbers. While the call center VSP solutions we seek to provide to clients do not have robo-dial capabilities, we will utilize several strategies to mitigate the possibility of unlawful robocalls.

Caller ID Authentication (STIR/SHAKEN)

- We will implement Secure Telephone Identity Revisited (STIR) and Signature-based Handling of Asserted Information Using Tokens (SHAKEN) protocols
- Ensure outgoing calls are authenticated and verified reducing the risk of caller ID spoofing

Call Analytics and Monitoring

- We will monitor clients' call activity to ensure regulatory compliance and to identify suspicious activities

Blacklisting and Whitelisting

- Develop and curate a list of known robo-dial numbers and sources in-order-to maintain a list of usable phone numbers likely not to be blocked by voice carrier networks
- Utilize sources to evaluate the reputation of utilized numbers over time to determine numbers that may become problematic

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Industry and Law Enforcement Collaboration and Cooperation

Voter Science will follow evolving industry best practices related to providing VSP services. In many cases, these practices can be more stringent than current legal and regulatory requirements. We will remain current on these trends and best practices by regularly reviewing current industry standards for VSP services.

In regards to law enforcement cooperation, Voter Science will cooperate with law enforcement in investigations and enforcement actions against unlawful robocall perpetrators. Additionally, we will provide information and support to assist in the persecution of unlawful robocall activities.

Education and Continuous Improvement

Voter Science will take several steps to provide education to clients and voter constituencies around evolving regulatory compliance and industry best practices while engaging in continuous improvement activities:

- Regularly review and update the robo-call mitigation plan to address emerging threats, evolving technologies, and changing regulatory and industry requirements
- Conduct periodic assessments of current mitigation strategies
- Inform and educate clients on the lawful and proper use of VSP services as it relates to call center and robo-dial activities
- Provide information via our website to inform voters and prospective clients regarding regulatory and industry trends live and automated voice communications while providing information on ways to protect themselves as well as opting out of communications using do-not-call (DNC) registries

Contact Information

Questions and concerns about our robocall mitigation plan can be directed to:

- Email: info@voter-science.com
- Or people may directly posit questions or comments using the chat functionality on our website

Conclusion

Voter Science, LLC is committed to protecting voters from unlawful robocalls while educating clients and the public about best practices and the lawful use of voice services for voter contact. Through the mitigation strategies outlined above, we will strive to provide lawful and industry compliant voices services for our clients while ensuring a positive experience for voters as part of their political civic engagement.