

Widewail, Inc Robocall Mitigation Plan

07/23/2024

Pursuant to section 64.6305(a)(1) and (2) of the rules of the Federal Communications Commission ("FCC"), Widewail, Inc. ("Widewail"), on behalf of itself and its affiliated voice service provider operating companies, details the specific reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program.

Steps to Avoid Originating Illegal Robocall Traffic

Widewail has adopted several practices to reduce the origination of illegal robocalls on its network.

Service Risk - Low - The Widewail platform offers functionality to send registered A2P 10DLC SMS traffic between local businesses ("Customers") and consumers on the phone numbers it provides. Widewail does not originate any phone calls on behalf of its Customers. Outbound calling functionality is limited only to allow a consumer to call a Widewail hosted number and be forwarded to a pre-configured destination number.

Known Your Customer - Widewail does not utilize online signup and self or auto-provisioning; all prospective Customers are screened by Widewail staff. Customers must be US or Canada based businesses with a valid tax identification number. Customers must pass vetting and verification by the Campaign Trust Registry ("TCR") as part of phone number provisioning. The TCR verification process includes:

- (1) Business entity verification
- (2) A2P 10DLC messaging compliance verification

Call Volume - Call volume is determined by recipients of Widewail SMS messages attempting to call that number back. This is a purely human driven process.

Caller ID & Monitoring - Widewail does not provide any proactive monitoring of outbound calls because it does not originate these calls.

Traceback Commitment - In the unlikely event of a traceback request, Widewail commits to respond within 1 business-day to such requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.