



EASY-CHAT SERVICES LLC

ROBOCALL MITIGATION DATABASE (RMD) PLAN

EASY-CHAT SERVICES LLC (“EASY-CHAT”) is firmly committed to identifying, preventing, reducing, mitigating, and ultimately eliminating illegal and unwanted robocalls within the telecommunications ecosystem. EASY-CHAT supports and strictly complies with all applicable regulations, rules, and policies issued by the Federal Communications Commission (“FCC” or “Commission”), including, without limitation, the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (“TRACED”) Act.

This document describes the policies, procedures, and operational standards established and maintained by EASY-CHAT as part of its Robocall Mitigation Program (“RMP”), which is registered and maintained in the FCC Robocall Mitigation Database (“RMD”). The purpose of this plan is to demonstrate EASY-CHAT’s proactive and reactive measures to detect, investigate, mitigate, and prevent illegal robocalls, while ensuring full regulatory compliance and cooperation with industry traceback and enforcement initiatives.

1. Traffic Analysis and Network Monitoring

EASY-CHAT’s engineering and network operations teams continuously perform advanced traffic analysis to identify potential illegal or unwanted robocall activity. These monitoring processes include, but are not limited to, the detection of suspicious traffic behaviors and anomalous calling patterns, such as:

- Abnormally short-duration or irregular-duration calls;
- High call attempt volumes with low completion ratios;
- Repeated failed call attempts and signaling errors (including SIP error codes such as 404 and 503);
- Calls rejected by the platform due to blacklisted or blocked numbers;
- Invalid, spoofed, or malformed Automatic Number Identification (“ANI”);
- Indicators of one-way audio, dead air, or abnormal session persistence.

When anomalies or confirmed indicators of illegal robocall activity are detected, EASY-CHAT immediately initiates mitigation measures. These actions may include traffic throttling, temporary suspension, or permanent blocking of the originating customer, platform, or IP addresses associated with the activity. EASY-CHAT maintains logs and technical records to support internal reviews and external regulatory or traceback requests.

2. Incident Investigation and Technical Anomaly Resolution

EASY-CHAT maintains formal investigation procedures to address carrier complaints, traceback requests, and partner reports. Upon receipt of a notification, EASY-CHAT promptly conducts a technical and operational review, which may include call detail record (“CDR”) analysis, signaling and media inspection, and coordination with downstream or upstream partners.

2.1 Technical Anomalies and Isolated Events

In certain cases, investigations may determine that reported issues resulted from isolated technical anomalies rather than intentional robocall campaigns. Examples include signaling failures, media path issues, or call teardown malfunctions that result in dead air or one-way audio. When such conditions are identified:

- EASY-CHAT confirms the root cause with the involved customer or partner;
- Immediate corrective actions are required, including configuration adjustments to media handling and signaling logic;
- EASY-CHAT verifies that the issue is isolated and not systemic;
- Post-incident monitoring is conducted to ensure the effectiveness of corrective measures.

Where logs demonstrate that a calling party attempted proper call termination but the session remained active due to signaling failure, EASY-CHAT documents the event as an unintentional technical error and not an annoyance or robocall campaign.

3. Call Record Validation and Attribution Review

EASY-CHAT performs comprehensive call record validation when specific calls are reported by carriers, regulators, or industry groups. This process includes a full review of internal CDRs, timestamps, ANIs, Call IDs, and associated network elements.

If an investigation determines that reported calls cannot be located within EASY-CHAT’s records:

- EASY-CHAT documents the absence of matching calls in its systems;

- Confirms whether any referenced IP addresses belong to EASY-CHAT infrastructure;
- Evaluates the possibility of misrouting, incorrect attribution, or external origination;
- Requests additional technical evidence, such as complete SIP traces or signaling logs, to support further investigation.

EASY-CHAT remains fully cooperative and continues investigative efforts upon receipt of additional verified information.

4. Toll-Free Traffic Oversight and Traffic Pumping Mitigation

EASY-CHAT applies heightened scrutiny to traffic destined for United States toll-free numbers due to the elevated risk of traffic pumping and fraudulent activity.

4.1 Detection and Analysis

EASY-CHAT evaluates toll-free traffic for:

- Abnormal call volume spikes;
- Repetitive calling patterns inconsistent with legitimate usage;
- Indicators of artificial call generation or revenue-sharing schemes.

Where investigations reveal minimal call volume or patterns inconsistent with traffic pumping, EASY-CHAT documents its findings accordingly.

4.2 Immediate Mitigation Actions

Notwithstanding the outcome of the analysis, EASY-CHAT may implement preventive actions to protect network integrity, including:

- Immediate blocking or suspension of the originating customer;
- Notification to upstream carriers and interconnecting partners;
- Implementation of enhanced monitoring and stricter thresholds for toll-free destinations;
- Deployment of automated anomaly detection and real-time blocking mechanisms.

These actions are taken to ensure regulatory compliance and to prevent any potential recurrence.

5. Know Your Customer (KYC) Process

EASY-CHAT maintains a robust Know Your Customer (“KYC”) policy applicable to all new and existing customers. This policy is designed to verify customer identity, business legitimacy, and operational intent.

KYC requirements include, but are not limited to:

- Legal business name and corporate documentation;
- Nature of business and intended traffic profile;
- Technical platform details;
- Federal Taxpayer Identification Number (or equivalent);
- Physical business address and contact information;
- Banking information and commercial references.

Customer information is reviewed and updated periodically, at a minimum on an annual basis, to identify any material changes in ownership, operations, or traffic behavior.

6. Acceptable Use Policy

As part of the onboarding process, all customers must formally agree to EASY-CHAT’s Acceptable Use Policy (“AUP”). The AUP strictly prohibits, among other activities:

- Unsolicited advertising, marketing, or telemarketing activities that violate applicable federal or state laws;
- Any conduct in violation of the TCPA, FCC rules (47 C.F.R. § 64.1200 et seq.), FTC regulations, CAN-SPAM Act, or Do Not Call regulations;
- Caller ID spoofing or misrepresentation in violation of the Truth in Caller ID Act;
- Fraudulent, deceptive, abusive, or misleading activities;
- Any illegal conduct or activity that exploits, harms, or threatens individuals.

Violations of the AUP may result in immediate suspension or termination of services.

7. Telephone Number Authorization and STIR/SHAKEN Compliance

EASY-CHAT is committed to the implementation and ongoing use of the STIR/SHAKEN framework to authenticate caller identity and reduce the risk of spoofed robocalls. EASY-CHAT utilizes available technological solutions to support call authentication while ensuring compliance with FCC mandates and implementation timelines.

8. Traceback Cooperation and Regulatory Compliance

EASY-CHAT fully cooperates with traceback requests and investigations initiated by the Industry Traceback Group (“ITG”), the FCC, and other authorized entities. Upon request, EASY-CHAT provides timely access to relevant call records, technical data, and investigative findings.

EASY-CHAT commits all necessary technical, operational, and compliance resources to support traceback efforts, investigate suspicious activity, and take corrective actions as required to maintain compliance with applicable laws and industry standards.

9. Continuous Improvement and Monitoring

EASY-CHAT continuously reviews and enhances its Robocall Mitigation Program to address emerging threats, regulatory updates, and industry best practices. Enhanced monitoring, internal audits, and procedural updates are conducted to ensure ongoing effectiveness and compliance.

This Robocall Mitigation Database Plan accurately reflects the policies and procedures of EASY-CHAT SERVICES LLC and is maintained as a living document subject to periodic review and update.

