

MINDSCOPE TECHNOLOGY LLC

ROBOCALL MITIGATION PLAN

I. Background

MindScope Technology LLC (“MindScope”) is committed to complying with the Federal Communications Commission (“FCC” or “Commission”) rules requiring voice service providers to file certifications and robocall mitigation plans in the FCC’s Robocall Mitigation Database (“RMD”). By February 26, 2024, all voice service providers must certify their implementation of the STIR/SHAKEN authentication framework and ensure that all calls they originate, carry, or process are subject to a robocall mitigation program consistent with the Commission’s rules.

II. Know Your Customer (“KYC”) Standards

MindScope, as an intermediate voice service provider, does not serve end users and does not sign any originating calls. We comply with the obligations under 47 C.F.R. § 64.6302 and have implemented commercially reasonable precautions to verify the identity of our customers. This includes:

- Customer business name
- State of incorporation
- Physical business location
- Contact person(s)
- FCC Filer ID and FRN
- STIR/SHAKEN status
- FCC Robocall Mitigation Database link

We verify our customers' status in the FCC’s Form 499 Filer database and the Robocall Mitigation Database to ensure current and active listings.

III. Acceptable Use Policy

MindScope’s customers’ use of its services is subject to our Acceptable Use Policy (AUP). This AUP prohibits:

- Using the Services to engage in any activities that are illegal, abusive, false, fraudulent, deceptive, or misleading.
- Engaging in any unsolicited advertising, marketing, or other unlawful activities using the Services.
- Creating a false identity, forged email address or header, phone number, or otherwise attempting to mislead others as to the identity of the sender or the origin of a message or phone call.

MindScope is authorized to suspend and/or terminate all Services in the event of an AUP violation.

IV. STIR-SHAKEN Capabilities

MindScope is a non-gateway intermediate provider that only contractually agrees to accept traffic that is already STIR/SHAKEN-authenticated before it is handed off to MindScope for carriage. We are not the originating provider capable of authenticating the calling party's relationship with the caller ID ascribed to a call originating by U.S.-based voice service providers. However, we accurately transmit all STIR/SHAKEN-related data we receive in the call path.

V. Proactive Network Monitoring

MindScope has various monitoring and reporting systems in place to analyze traffic on its network for potentially suspicious traffic patterns associated with illegal robocalls or other potentially unlawful usage. We take prompt action to identify the party using our network to carry these calls and take appropriate action.

VI. Commitment to Timely Traceback Responses and Cooperation

MindScope commits to responding fully and promptly, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. We will dedicate sufficient resources to provide timely and complete responses and investigate suspicious activities.

VII. Traceback Cooperation

We certify that MindScope commits to responding to all traceback requests and to

cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use its service to originate calls.

VIII. KNOW YOUR CUSTOMER QUESTIONNAIRE

1. Entity type (e.g., corporation, LLC): LLC
2. Customer name, including all trade names, fictitious names, and DBAs: MindScope Technology LLC
3. State or country of formation: Delaware
4. Federal taxpayer identification number (EIN): [Insert EIN]
5. FCC Filer identification number: [Insert FRN]
6. Robocall Mitigation Database Number: [Insert RMD Number]
7. Name, physical address, email address, and telephone number of the natural persons who own the Customer: [Insert Owner Information]
8. Websites and social media pages used by Customer: [Insert URLs]
9. Name, telephone number, and email address of the compliance officer: [Insert Compliance Officer Information]
10. Business license or registration number: [Insert License Information]
11. Description of Customer's business: [Insert Business Description]
12. Physical address of Customer's business: [Insert Address]
13. Adverse judgment in civil lawsuit related to illegal robocalling: [Yes/No]
14. Wholesale provider status: [Yes/No]