

First Contact Communications, LLC Robocall Mitigation Plan

First Contact Communications, LLC submits this Robocall Mitigation Plan (“Plan”) pursuant to 47 C.F.R. § 64.6305. This Plan describes First Contact Communications efforts to mitigate illegal robocalls consistent with the FCC’s rules. We have not been prohibited from filing a certification in the Robocall Mitigation Database.

First Contact Communications may modify, add, delete, or otherwise alter any part of this Plan in order to respond to changes in its business, technologies, needs, industry best practices, or any applicable law or regulations. First Contact Communications will update this Plan within ten (10) business days following the date of any changes to the Plan.

First Contact Communications, LLC, nor any of our executives or principals, have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

First Contact Communications Roles in the Call Chain

First Contact Communications operates as a voice service provider (Reseller) when it provides voice over internet protocol (“VoIP”) services to end-user customers.

STIR/SHAKEN Implementation Status

As a voice service Reseller offering VoIP service to end-user customers, First Contact Communications does not have an obligation to implement the STIR/SHAKEN Caller ID Authentication Framework. To provide VoIP service to end-user customers, First Contact Communications resells VoIP services obtained from third-party providers. BluIP, INC., (RMD0003151) and Reinvent Telecom (RMD0004216). Although First Contact Communications installs, bills, and provides customer support as a reseller of VoIP services, First Contact Communications “lack[s] control over the necessary network infrastructure to implement STIR/SHAKEN.”¹ First Contact Communications therefore relies on BluIP, INC., (RMD0003151) and Reinvent Telecom’s (RMD0004216) implementation of STIR/SHAKEN Caller ID Authentication Framework across its network.

Customer Vetting Process

First Contact Communications vets the identity of subscribers when (i) approving an application for service; (ii) provisioning of network connectivity; (iii) entering into a contract agreement; or (iv) granting the right-to-use any U.S. telephone number resources. Before onboarding customers, First Contact Communications collects information to confirm their identity including their full legal name, federal tax ID (if applicable), principal place of business, contact person, and state or country of incorporation. First Contact Communications reconfirms this information for renewing customers.

Upstream Provider Vetting Process

First Contact Communications vets its upstream providers prior to accepting their traffic through its contractual relationship with BluIP, INC., (RMD0003151) and Reinvent Telecom (RMD0004216) and the upstream provider vetting procedures maintained by BluIP, INC., (RMD0003151) and Reinvent Telecom (RMD0004216) (including BluIP’s and Reinvent

Telecom's master service agreements with its suppliers). Through its wholesale providers BluIP INC., (RMD0003151) and Reinvent Telecom, (RMD0004216) First Contact Communications also confirms whether the upstream provider is identified in the Robocall Mitigation Database (to the extent required).

Acceptable Use Policy and Other Robocall Mitigation Measures

As a reseller of VoIP services, First Contact Communications relies on other robocall mitigation measures undertaken by its wholesale providers BluIP INC., (RMD0003151) and Reinvent Telecom (RMD0004216). First Contact Communications does not use any other third-party services for purposes of call analytics.

Traceback Commitment

First Contact Communications commits to respond fully, within 24 hours, to valid traceback requests made by the Industry Traceback Group (ITG), U.S. government agencies (including the FCC), U.S. law enforcement, and to cooperate with such entities in investigating and stopping illegal robocallers that use First Contact Communication's service to originate, carry, or process illegal robocalls.

Ownership and Management

First Contact Communications LLC., is a solely owned company based in Albuquerque New Mexico.

Company Website can be found at www.FirstContactVOIP.com

¹ See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, para. 40 (2020) (excluding from a STIR/SHAKEN implementation obligation those providers that lack control over the necessary network infrastructure); See *Call Authentication Trust Anchor*, Second Report and Order, 36 FCC Rcd 1859, para. 19 (2020).

² 47 C.F.R. § 64.6304(d).