

PRIORITY FIRST LLC.

[Robocall Mitigation Plan](#)

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2 Company Introduction

PRIORITY FIRST was formed in 2021 and is registered in USA as “PRIORITY FIRST LLC”. We are located in RI United States . We are aiming to expand around the globe with passage of time.

Priorityfirst is a global provider of Complete Call Center Solutions. Our company is known for providing best contact center solutions around the globe with support. End users benefit from the company services and they grow their businesses using intelligent solutions provided by us. Contact Centers completely feel secure when using our products as we protect them by making them oblige all the rules and regulations. This helps us achieve long term relationships with End Users and our Vendors.

PRIORITY FIRST completely abides all the regulations indicated by FCC and is full complaint with FCC and FCC indicated entities. Therefore, we also provide solutions to FCC registered users and depending upon the service, PRIORITY FIRST may serve as Voice Service Provider or Gateway Provider.

3 Robocall Mitigation Filing

Pursuant to the applicable orders and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Program (“RMP”) details the policies and practices that PRIORITY FIRST has established to prevent unlawful robocalls from originating on, terminating to, or routing through PRIORITY FIRST voice networks where it is operating as a Voice Service Provider or Gateway Provider. Unless defined differently herein, capitalized terms used herein have the same definitions as set forth under 47 C.F.R § 64.6300.

3.1 Filling of Robocall Mitigation Database

PRIORITY FIRST has fully registered with Robocall Mitigation Program as Voice Service Provider and Gateway Provider as a Certified Complete STIR/SHAKEN Implementation Filer under RMD Number: The filer certifies that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it carries or processes are compliant with § 64.6302(b). The filer also certifies that the attached searchable PDF details the specific reasonable steps it has taken to avoid carrying or processing illegal robocall traffic and includes a commitment to respond fully and within 24 hours to all traceback 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 carry or process calls.

3.2 Filing of ICONECTIV

The Federal Communications Commission (FCC) has been encouraging the telecommunications industry to develop a solution to stop robocalls and spoofed calling numbers since 2014. The industry’s response has been to develop a new technology standard called STIR (Secure Telephony Identity Revisited) and SHAKEN (Secure Handling of Asserted information using tokens) which defines how telephone service providers should implement the STIR technology to ensure calling numbers are not spoofed. PRIORITY FIRST has fully registered with ICONECTIV and has started signing the calls as an authorized provider (<https://authenticate.iconectiv.com/authorized-service-providers-authenticate>). We have implemented the STIR/SHAKEN authentication framework across our entire network and all calls it carries or processes are compliant with FCC Rule, 47 C.F.R. § 64.6302(b). With above, we are committed to respond within 24 hours to industry tracebacks and requests from Commission, Law enforcement, vendors and all such entities involved in stopping illegal robocallers using its service to carry process calls.

4 Robocall Mitigation Plan

PRIORITY FIRST is practicing following plan on all its calling platforms to adhere with FCC and its entities rules and regulations. We are taking below steps to avoid illegal robocall traffic on our routes.

4.1 KYC

PRIORITY FIRST implements the appropriate Know Your Customer (KYC) protocol to abide with the FCC's Caller ID Authentication Best Practices No. 16 and 47 C.F.R. § 64.1200. With this, we retrieve the identity of retail and FCC subscribers by requiring sufficient information to ensure its legitimacy. We usually take following info from end users; First name, Last Name, Email, Company Name, Contact No, Address, ZIP, skype, proof of identity or business, Campaign and country of operations. If customer is registered with FCC as a Business or Voice Service Provider, we take FCC ID, RMD ID and no of tracebacks. From both type of users, we take this info before enrolling them on our network.

4.2 Right to Terminate Customer

PRIORITY FIRST sends an agreement to every customer which they accept before starting traffic stating that PRIORITY FIRST preserves the right to terminate every customer who is directly or indirectly involved in any kind of SCAM or Robocalls. Our agreements include terms that forbid the customer from using our services to originate and/or otherwise transmit calls that violate laws restricting robocalls or other telemarketing calls, including the federal Telephone Consumer Protection Act ("TCPA") and/or the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act ("TRACED Act") and/or the rules promulgated pursuant to these statutes. Our terms clarify that if any calls originated or otherwise transmitted by the customer to PRIORITY FIRST violate the TCPA, the TRACED Act, or the rules promulgated under these statutes, then PRIORITY FIRST may, at its sole discretion, suspend or terminate the customer's service immediately, among other remedies.

4.3 Robocall Mitigation Registered Providers

PRIORITY FIRST accepts calls directly from a domestic Voice Provider only if that provider is registered with RMD and there are no sanctions on that provider by FCC or any law enforcement authorities in accordance with 47 C.F.R § 64.6305.

PRIORITY FIRST accepts calls directly from a Gateway Provider only if that provider is registered with RMD and there are no sanctions on that provider by FCC or any law enforcement authorities in accordance with 47 C.F.R § 64.6305, beginning 90 days after the deadline for filing certifications pursuant to 47 C.F.R § 64.6305.

4.4 DNO

PRIORITY FIRST is blocking all the calls which are prohibited by FCC and are under Do Not Originate (DNO) list that is associated with NANP. Our routing protocols are blocking all calls that are determined to originate from a DNO number in accordance with FCC Rules, 47 C.F.R. § 64.1200(k)(2) and (o)(1)-(4).

4.5 National DO NOT CALL Registry

PRIORITY FIRST is blocking all the calls which are terminating on the numbers determined under NDNC (National DO NOT CALL Registry) in accordance with FCC Rules, 47 C.F.R. § 310.8(c) § 310.4(b)(1)(iii)(B) §§ 310.4(b)(1)(iii)(B)(i) or (ii).

4.6 No SPOOFING

PRIORITY FIRST has taken excellent steps to avoid any kind of spoofing by setting restrictions on Caller IDs. We are preventing it at routing level where calls with only pre-whitelisted caller IDs are allowed to make calls from. This way, every of our customer is sending caller IDs to pre-whitelist on our networks. In addition to this, our system intelligently checks every caller ID working for inbound and then allows caller IDs to terminate calls. Therefore, concept of spoofing on our network is around ZERO.

4.7 NOC Department

PRIORITY FIRST has devised a NOC department to deal with current situation of Robocalls. Our NOC department is actively working in different areas of traffic to analyze the caller IDs and nature of traffic. They are making sure that traffic is abiding all the FCC Laws to terminate and originate the traffic with in the US.

We are taking one step ahead every day to take preventive measures and make sure traffic is completely legitimate on our networks.

4.8 CPS Limitations on Trial

PRIORITY FIRST is taking an additional step by taking customers on trial for one week and limiting CPS to 20-50 depending upon the nature of the traffic. This way our NOC department is able to look closely at the traffic and they make sure customer is not terminating any robocalls and nature of traffic is legitimate. This keeps us in line with the Agenda of FCC.

4.9 Upcoming Steps to avoid robocall Traffic.

In addition to all the steps above, PRIORITY FIRST is actively working on the next steps to avoid 100% robocalls. We are developing a mechanism to detect Robocall directly at routing level and blocking the calls straight when it detects a robocall. We have also devised a budget for these developments at administration level and our team is determined to achieve 100% No ROBO on our networks. Consistent with FCC Regulations, 47 C.F.R. § 64.6305(c)(5) & (d)(5), PRIORITY FIRST will update its submission in the RMD within 10 business days of any change to the applicable information it must provide in the Robocall Mitigation Database, including its Robocall Mitigation Plan.

Exhibit A

Company Name or Trade Name	FRN
PRIORITY FIRST LLC	0035392935