

Robocall Mitigation Plan

Company Name: Nextricity

FRN: 0037002441

1. Description of Mitigation Practices

Nextricity is fully committed to preventing the origination of illegal and unwanted robocalls across its network. We maintain a comprehensive robocall mitigation program in accordance with 47 CFR § 64.6305(b).

Our approach includes:

- Know-Your-Customer (KYC) protocols for all upstream clients and partners.
- Manual and automated vetting of traffic profiles before activation.
- Continuous monitoring of call signaling data, traffic volumes, and destination metrics.
- Active participation in traceback efforts and immediate action when suspicious robocall behavior is detected.
- 24/7 Network Operations Center (NOC) support with real-time alerting for short-duration and anomalous call spikes.

2. Know-Your-Customer (KYC) Measures

Before activating service for any customer, Nextricity requires:

- Legal corporate name and physical address.
- Government-issued identification or verifiable business license.
- A description of the customer's use case and estimated call volume.
- Identification of traffic type (telemarketing, customer support, etc.).
- Disclosure of upstream and downstream call pathways, if applicable.
- Written certification that the customer will not originate or transmit illegal robocalls.

We reserve the right to suspend or terminate service if a customer exhibits abusive or suspicious behavior.

3. Monitoring and Call Analytics

Nextricify uses a combination of proprietary tools and third-party analytics to detect and review suspicious call patterns, including:

- Abnormally low average call durations.
- Unusual high-volume, short-duration traffic.
- Invalid or malformed caller ID data.
- Frequent calling to high-risk or fraudulent destinations.
- Sudden spikes in traffic not consistent with declared use cases.

Any flagged traffic is escalated immediately to our compliance and operations teams for investigation.

4. Cooperation with Law Enforcement and Industry Initiatives

Nextricify actively collaborates with:

- The FCC, FTC, and law enforcement agencies on traceback and enforcement efforts.
- The Industry Traceback Group (ITG) organized by USTelecom.
- STIR/SHAKEN partners for secure caller identity authentication.

We respond to traceback requests within 24 hours, and initiate corrective measures within 1-2 business days if violations are found.

5. Future STIR/SHAKEN Implementation Plans

Nextricify is in the process of implementing STIR/SHAKEN technology across its IP-based infrastructure and an OCN application is in process to acquire SPC token and comply fully with any future regulatory requirements.

6. Point of Contact for Robocall Mitigation

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