

Ambivo Inc.

ROBOCALL MITIGATION PLAN

Ambivo Inc., FCC Registration Number (FRN) 0036964856, operates as a pure reseller by purchasing numbers from our originating service provider (VoIP) and utilizing their API to make outbound calls without using any other providers or controlling the underlying network infrastructure. Since we rely exclusively on our originating service provider's (VoIP) infrastructure via their API rather than managing our own network facilities, we qualify as a pure reseller that is reselling our originating service provider's (VoIP) services without network infrastructure control, which means we certify as "No STIR/SHAKEN Implementation" in the Robocall Mitigation Database and do not need to obtain our own SPC token.

Ambivo Inc. does not have control over network infrastructure necessary to implement STIR/SHAKEN, pursuant to 47 CFR 64.6305(d)(2)(i), and therefore has no STIR/SHAKEN implementation obligation.

Robocall Mitigation Plan

All voice traffic that originates through our service is subject to the following Robocall Mitigation Plan.

The following is an outline of steps deployed to combat the origination of illegal robocalls:

Customer Verification and Know Your Customer

- Ambivo vets all new customers before providing service
- We gather contact information and verify customer identity
- We verify business legitimacy for commercial customers
- We require customers to provide documentation for authorized use of phone numbers

Traffic Monitoring and Investigation

- Ambivo monitors call patterns and volumes for all customer accounts to identify suspected robocall activity
- We implement automated systems to detect unusual calling patterns, high-volume traffic, and suspicious behavior
- If any patterns are discovered, Ambivo will immediately investigate and identify the customer responsible
- We take appropriate action including service suspension, account termination, and notification to law enforcement authorities, the FCC, and the FTC

Customer Agreement and Enforcement

- Ambivo requires all customers to acknowledge in their service agreement that it is illegal to:
 - Spoof or falsify caller ID for fraudulent purposes
 - Make unsolicited telemarketing calls without proper authorization
 - Originate illegal robocalls or participate in robocalling schemes
- Customers found abusing our service will be immediately disconnected and reported to appropriate authorities
- We maintain strict contractual terms allowing immediate termination for violation of robocall regulations

Upstream Provider Compliance

- Ambivo verifies that our originating service provider is listed in the Robocall Mitigation Database with proper STIR/SHAKEN implementation
- We rely on our provider's Robocall Mitigation Plan to ensure they properly monitor and authenticate originating traffic

Role In the Call Chain

Ambivo is a pure reseller voice service provider without control over network infrastructure and therefore has no STIR/SHAKEN implementation obligation. We rely entirely on our originating service provider's STIR/SHAKEN implementation and network infrastructure to authenticate and sign calls on our behalf.

Traceback

Ambivo is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Ambivo will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

- Ambivo has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling
- Ambivo has not been prohibited from filing in the Robocall Mitigation Database (RMD)
- Ambivo certifies "No STIR/SHAKEN Implementation" due to lack of control over network infrastructure necessary to implement STIR/SHAKEN, pursuant to 47 CFR 64.6305(d)(2)(i)

Company Information

Company Name: Ambivo Inc.

FCC Registration Number (FRN): 0036964856

Service Type: Pure Reseller - VoIP Services

STIR/SHAKEN Status: No Implementation (Network Infrastructure Exemption)