



Robocall Mitigation Program Description

Valinor LLC dba Brighter.Tel (“Brighter.Tel”) has implemented a Robocall Mitigation Program designed to prevent the origination of illegal robocall traffic and comply with all applicable FCC regulations under 47 CFR § 64.6305(a).

Brighter.Tel provides hosted voice services to business customers. It does not provide residential or wholesale services and is not a gateway or intermediate provider.

1. Know Your Customer (KYC) Policies

Brighter.Tel takes the following steps to prevent new and renewing customers from originating illegal robocalls:

- **Business verification**, such as business registration or tax ID, when the service review warrants it
- **Terms of Service** that explicitly prohibit illegal robocalling and caller ID spoofing
- **Service review** to understand intended use and calling patterns
- **Refusal of service** to prospective customers whose intended use presents a risk of illegal calling

2. Traffic Monitoring and Mitigation

Our outbound traffic is subject to real-time call analytics, provided by third-party vendor TransNexus and operated by our upstream provider, to identify and prevent illegal robocall behavior:

- **Automated monitoring** for anomalous calling patterns including:
 - High call volumes and calls-per-second rates
 - Short duration calls in bulk
 - Invalid, unallocated, or Do-Not-Originate caller IDs, and numbers with a poor reputation
- **Investigation** of suspicious activity with ability to block, rate-limit, or suspend service
- **Enforcement policy**: suspicious or unlawful traffic may result in a warning, call blocking, rate limiting, suspension, or termination of service, consistent with our terms of service and those of our upstream provider

3. STIR/SHAKEN

- We rely on our upstream provider's STIR/SHAKEN implementation for call authentication
- Our upstream provider is registered with STI-PA and signs all calls with a STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA), and has implemented Out-of-Band SHAKEN for calls that rely on non-IP technology

4. Caller ID Integrity

- Outbound caller ID is limited to numbers assigned to the customer's account or where proof of ownership is submitted and verified
- Customers are prohibited from using caller ID numbers outside their authorized inventory

5. Traceback Cooperation

Brighter.Tel fully supports FCC and Industry Traceback Group efforts:

- **24-hour response** commitment to all traceback requests
- **Full cooperation** with the FCC, law enforcement, and the Industry Traceback Group
- **Investigation and enforcement** including service termination for verified violations
- **Record retention** of call detail records and customer information for investigative purposes

6. Know Your Upstream Provider

Brighter.Tel does not carry or transit traffic for other providers. We use only upstream providers that maintain an active Robocall Mitigation Database certification and robocall mitigation program. We confirm their RMD status at each annual recertification and before adding a new provider, and keep their current robocall mitigation plans on file.

7. Ongoing Review and Compliance

- Robocall Mitigation Program reviewed **at least annually** and updated as needed, including after material service, vendor, or regulatory changes
- Robocall mitigation and traceback responsibilities assigned to contact designated in our RMD filing
- Records maintained include customer account information, assigned-number records, and call detail records; additional call records and traces obtained from upstream providers when needed for an investigation

Certification

Brighter.Tel certifies that we:

- Have implemented the practices described in this Robocall Mitigation Plan
- Do not knowingly originate or facilitate illegal robocall traffic
- Will respond fully to all traceback requests within 24 hours
- Maintain compliance with all applicable FCC robocall mitigation requirements