



Callbetter LLC
ROBOCALL MITIGATION PLAN V3
(MARCH 2026)

1. INTRODUCTION AND REGULATORY ACKNOWLEDGMENT

Callbetter LLC ("the Company") submits this Robocall Mitigation Plan in accordance with the requirements of 47 CFR § 64.6305. The Company acknowledges its obligation to implement a robocall mitigation program to prevent the origination of illegal robocalls and to ensure that all voice traffic originated on its network is subject to the reasonable steps outlined in this document.

This plan is structured to provide clear documentation of our vetting procedures, network monitoring, and commitment to industry-wide traceback efforts.

2. BUSINESS IDENTIFICATION

Callbetter LLC is a domestic US voice service provider.

Corporate History: Formerly known as Ringtree LLC. The name change to Callbetter LLC was finalized in the State of Delaware on January 2, 2026.

FRN: 0037863362

499 Filer ID: 838430

OCN:092M

3. Know your Customer(KYC) Protocols

Callbetter LLC maintains a mandatory onboarding protocol to comply with our obligations under 47 CFR § 64.1200(n)(4). Callbetter LLC maintains a direct authenticated relationship with every customer on its platform. We do not allow 'sub-customers' or 're-wholesale' traffic. No user is to be provisioned until they successfully pass the following verification stages:

- a. **Identity Verification:** Multi-factor authentication via a third-party API(Vonage Identity Insights) to tie the account to a verified mobile device and customer name. If this check fails, the user is prompted to complete Stripe Id Verification - ID document upload via video to confirm identity.
- b. **Use Case Requirement:** We strictly prohibit high-volume automated dialing, robocalling, or any traffic inconsistent with verified business communication as outlined in our terms of service that must be agreed to prior to access.
- c. **Digital Attestation:** Users must affirmatively check a certification box agreeing to comply with the Acceptable Use Policy which includes compliance with TRACED Act and FCC regulations.

TIN Verification (A2P Signup)

During the A2P (Application-to-Person) signup process, the Company performs automated cross-referencing of EINs for registered entities against official TIN records using a third-party API (**Zenwork, Inc**) to ensure the entity is active and legitimate. If automated EIN checking fails, we demand additional verification documentation such as business Articles of Organization or IRS CP 575, which are manually reviewed prior to traffic authorization.

4. STIR/SHAKEN & UPSTREAM RELIANCE

Callbetter LLC certifies as "Complete Implementation" for the purposes of this filing.

Authentication Framework As of February 2026, Callbetter LLC has successfully:

1. Obtained its **Service Provider Code (SPC) Token** from the STI-PA (iconectiv).
2. Generated and installed its own digital identity certificates.
3. Fully integrated STIR/SHAKEN authentication into its IP-based switching platform.

Execution of Signing The Company now self-signs all SIP-originated calls with the highest possible level of attestation (Level A) whenever the customer's right to the phone number is verified through our internal inventory management system.

Know Your Upstream Provider Procedures

Callbetter LLC only establishes interconnections with upstream carriers that are fully registered in the FCC Robocall Mitigation Database and have a "Complete Implementation" status of STIR/SHAKEN.

Our current primary upstream provider is Telnyx. We have vetted Telnyx to ensure they maintain a high-trust network and have active STIR/SHAKEN authentication protocols in place.

Before adding any additional upstream or peering partners, Callbetter LLC will:

Verify the provider's OCN and FRN.

Confirm their status in the FCC Robocall Mitigation Database.

Review their Robocall Mitigation Plan to ensure it meets our internal standards for traffic integrity.

Require contractual language that strictly prohibits the origination or transit of illegal robocall traffic

5. TRAFFIC MONITORING & MITIGATION

Callbetter LLC employs a comprehensive, multi-tiered behavioral monitoring and mitigation framework. This system is designed to detect, flag, and neutralize suspicious traffic patterns in real-time to ensure full compliance with STIR/SHAKEN frameworks and industry best practices.

Automated Real-Time Threshold Analytics

Our network utilizes automated monitoring systems that track traffic metadata against baseline behavioral profiles. Key metrics monitored include but are not limited to:

- **Concurrent Call Sessions:** Automated triggers flag any account exceeding predefined capacity thresholds relative to their specific business use case.
- **Call Completion Rates (CCR):** Systems monitor for abnormally low completion rates, which often indicate large-scale robocalling or fraud attempts.
- **Short-Duration Calls:** We specifically track "burst" traffic—calls with a duration of less than six (6) seconds—which are characteristic of automated dialer anomalies.

Rapid Response & Manual Intervention Protocols

When the automated system generates a high-risk alert, the following mitigation steps are executed immediately:

- **Mandatory Compliance Audit:** Flagged accounts are diverted to our security team for a manual review of traffic logs, traceback history, and customer "Know Your Customer" (KYC) documentation.
- **Immediate Service Suspension:** Pursuant to our AUP, Callbetter LLC maintains a "kill-switch" protocol. Any account found to be originating illegal, fraudulent, or unauthorized high-volume traffic is suspended immediately to prevent further network egress.
- **Industry Traceback Integration:** We maintain a dedicated response path for the Industry Traceback Group (ITG), ensuring that any suspected traffic can be isolated and the source identified within the timeframes mandated by the FCC.

DO NOT ORIGINATE (DNO) MITIGATION

Callbetter LLC utilizes strict switch-level egress filtering. We only permit traffic to originate from the specific, verified DID assigned to each customer account. Our switching logic automatically blocks (DNO) any call attempts purporting to originate from invalid, unassigned, or non-authorized caller ID numbers, effectively preventing spoofing at the network edge. We do not permit end-users to manually modify or populate the Caller ID field. Instead, Caller ID

information is system-assigned and enforced at the switch level, ensuring it strictly matches the inventory assigned to the customer.

6. COMPLIANCE & UPDATES

Callbetter LLC commits to responding to all Industry Traceback Group (ITG), FCC, and law enforcement requests within 24 hours. Our Compliance and Mitigation Contact maintains 24/7 automated alerting for all Industry Traceback Group (ITG), and FCC portal notifications to ensure we meet the mandatory 24-hour response window, even during non-business hours. We will update this filing within 10 business days of any material change to our vetting procedures or operational status to ensure continued accuracy.

7. ENFORCEMENT HISTORY

Neither Callbetter LLC nor any entity under common ownership or control has been the subject of a formal Commission, law enforcement, or regulatory investigation related to illegal robocalls, spoofing, or deficient RMD filings within the last two years.

8. ANNUAL RECERTIFICATION ACKNOWLEDGEMENT

The Company Acknowledges our obligation to recertify this plan annually.

9. COMPLIANCE AND MITIGATION CONTACT

Pursuant to 47 CFR § 64.6305, the following individual is designated as the primary point of contact for robocall mitigation, traceback requests, and regulatory compliance:

Name: Abraham Gross

Title: President and Principal Officer

Department: Compliance

Business Address: 8 The Green Suite #21079 Dover DE 19901

Telephone: 888 668-1484

Email: compliance@callbetter.com

Secondary Email: bengross@callbetter.com

Signed by an officer in conformity with 47 CFR 1.16

I, Abraham Gross, certify under penalty of perjury that I am an officer of Callbetter LLC authorized to make this certification, and that I have examined the foregoing Robocall Mitigation Plan and, to the best of my knowledge, information, and belief, all statements of fact contained herein are true and correct. I further certify that Callbetter LLC will update its information in the Robocall Mitigation Database within ten (10) business days of any material change to its operational status or mitigation procedures.

Abraham Gross

President and Principal Officer

Callbetter LLC

8 The Green Suite #21079 Dover DE 19901

A handwritten signature in black ink, appearing to be 'AG' or a stylized version of the name Abraham Gross.