

ROBOCALL MITIGATION PLAN

NextraVoice Connect Inc.

FCC Registration Number (FRN): 0037702487 Filing Date: February 2026 Last Updated: January 30, 2026

COMPANY INFORMATION

Legal Name: NextraVoice Connect Inc. Business Type: C Corporation Address: 1305 Middle Country Rd Unit 12, Selden, NY 11784 Compliance Officer: Tanasha Kellyman Scott, CEO

Email: compliance@nextravoiceconnect.com Phone: To be assigned upon service activation

PROVIDER INFORMATION

Service Type: Cloud-based VoIP business communications (voice calls, SMS/MMS, call routing, virtual receptionist, voicemail)

Target Customers: Small and mid-sized businesses in the United States and Canada

Network Architecture:

- Platform Provider: Telinta (white-label VoIP)
- DID Provider: Bulk Solutions (via Telinta)
- Network: Cloud VoIP over IP networks
- Coverage: United States and Canada

STIR/SHAKEN Implementation: NextraVoice does not directly implement STIR/SHAKEN. Our upstream providers Telinta and Bulk Solutions implement STIR/SHAKEN authentication.

Both providers are verified as registered in the FCC Robocall Mitigation Database.

KNOW YOUR CUSTOMER (KYC) PROGRAM

Individual Customer Verification:

- Government-issued photo ID
- Social Security Number verification
- Physical address confirmation
- Phone and email verification

Business Customer Verification:

- Employer Identification Number (EIN)
- Business registration documents
- Business address verification
- Principal officer ID verification
- Website and online presence review

High-Risk Industry Screening: Industries requiring enhanced due diligence include telemarketing, debt collection, political campaigns, healthcare marketing, financial services, and timeshare sales. Enhanced measures include manual CEO review, reference checks, restricted initial calling limits (500 calls/day for 30 days), and security deposits.

Prohibited Customers: We refuse service to customers with known TCPA violations, FCC enforcement actions, inability to provide verification, or suspected fraudulent operations.

CUSTOMER COMPLIANCE REQUIREMENTS

Terms of Service Prohibitions:

- Illegal robocalls without proper consent
- TCPA and CAN-SPAM violations
- Caller ID spoofing violations
- Harassment, threats, or abuse
- Telemarketing law violations

Acceptable Use Policy Requirements:

- Prior express written consent for marketing calls
- Maintain and honor internal do-not-call lists
- Comply with National Do Not Call Registry
- Respect call time restrictions (8 AM to 9 PM local time)
- Provide accurate caller ID information
- Immediate compliance with opt-out requests

Customer Compliance Tools:

- TCPA compliance guidelines
- DNC registry integration
- Call time zone awareness features
- Consent tracking templates

CALL MONITORING AND ANALYTICS

Automated Monitoring Systems:

- Alerts for accounts exceeding 1,000 outbound calls per day
- Detection of calling spikes greater than 200% day-over-day
- Monitoring for repetitive calling (more than 3 calls to same number in 24 hours)
- Detection of short-duration calls (less than 10 seconds)
- Call abandonment rate monitoring (alerts at 3%)
- Geographic anomaly detection

- Sequential number dialing detection

Current Technology: Telinta platform analytics, custom monitoring dashboards, automated alert systems

Planned Technology: Third-party analytics vendors (YouMail, First Orion, Hiya) to be added post-funding

Review Schedule:

- Daily: Top 20 highest-volume accounts, all complaints, newly activated accounts
- Weekly: High-risk industry accounts, flagged accounts
- Monthly: Random 10% audit of all active accounts

COMPLAINT RESPONSE PROCEDURES

Response Timeline:

- Complaint acknowledgment: 2 business hours
- Investigation initiated: 24 hours
- Preliminary findings: 48 hours
- Resolution decision: 72 hours

Investigation Process:

1. Review call detail records for reported incident
2. Identify customer account associated with calls
3. Suspend account immediately if egregious violation evident
4. Contact customer for explanation and documentation
5. Review historical calling patterns and consent records
6. Make determination on violation status

Enforcement Actions:

Minor Violations (first offense, non-willful): Written warning, corrective action plan required within 5 days, 30-day probationary monitoring

Moderate Violations (repeat minor or significant single violation): 7-day service suspension, compliance audit required, \$1,000 security deposit, 90-day probationary period, calling limits reduced by 60%, monthly compliance certifications required

Severe Violations (willful, large-scale, or fraudulent): Immediate permanent account termination, no refunds, report to FCC, FTC, state Attorney General, and Industry Traceback Group, evidence preservation for 7 years, full law enforcement cooperation

TRACEBACK AND AUTHORITY COOPERATION

Industry Traceback Group Commitment:

- Respond to all traceback requests within 24 hours
- Provide complete call detail records
- Provide customer verification documentation
- Take immediate action against confirmed violators
- Contact: traceback@nexttravoiceconnect.com

Law Enforcement Cooperation: Full cooperation with FCC, FTC, DOJ, FBI, and state attorneys general. Evidence preservation within 24 hours of request. Compliance with all subpoenas and court orders. Proactive reporting of suspected criminal activity.

Upstream Provider Verification:

- Telinta: Verified RMD registered, STIR/SHAKEN implemented
- Bulk Solutions: Verified RMD registered, operates via Telinta
- Quarterly verification of provider compliance status
- Annual comprehensive provider review

DATA RETENTION

Call Detail Records: Retained for 2 years. Includes calling and called numbers, date, time, duration, customer account, routing information, and caller ID data.

Customer Records: Retained for 7 years after account closure. Includes verification documents, terms acceptance records, complaint records, account activity logs, and billing history.

Compliance Documentation: Retained indefinitely. Includes RMD certifications, policies, FCC correspondence, and training records.

Call Recordings and Messages: Default retention 90 days (customer configurable up to 2 years). Recordings related to complaints retained for 7 years.

EMPLOYEE TRAINING

New Employee Onboarding (4 hours total):

- FCC regulations and TCPA requirements
- Company robocall mitigation policies and procedures
- Role-specific compliance training
- Practical scenarios and comprehension testing (80% pass required)

Annual Refresher Training (2 hours):

- Regulatory updates and policy changes
- Recent enforcement case studies
- New best practices and technologies
- Comprehension testing (80% pass required)

Documentation: All training completion certificates, test scores, and employee acknowledgment forms retained indefinitely.

CONTINUOUS IMPROVEMENT

Annual Review: Complete plan review by March 1 each year. Assessment includes effectiveness evaluation, complaint trend analysis, regulatory update incorporation, and technology assessment.

Interim Updates: Plan updated within 10 business days of material changes to business operations, upstream providers, or FCC regulations.

Stakeholder Feedback: Regular feedback collection from customers, upstream providers, industry peers, and regulatory authorities.

COMMITMENT STATEMENT

NextraVoice Connect Inc. commits to:

- Preventing the transmission of illegal robocalls through our network
- Responding to Industry Traceback Group requests within 24 hours
- Full cooperation with all law enforcement and regulatory investigations
- Continuous monitoring and improvement of our mitigation program
- Annual RMD recertification and plan updates as required by FCC regulations

CONTACT INFORMATION

Robocall Complaints and Traceback: traceback@nexttravoiceconnect.com (24/7 email monitoring) General Compliance: compliance@nexttravoiceconnect.com Legal and Regulatory: legal@nexttravoiceconnect.com

Mailing Address: NextraVoice Connect Inc. Attention: Legal and Compliance Department 1305 Middle Country Rd Unit 12 Selden, NY 11784

CERTIFICATION

I certify under penalty of perjury that I am authorized to make this filing on behalf of NextraVoice Connect Inc., and that all information contained in this Robocall Mitigation Plan is true, complete, and accurate to the best of my knowledge.

Signature: _____

Name: Tanasha Kellyman Scott Title: Chief Executive Officer and Compliance Officer Date: _____

Document Version: 1.0 Submission Date: February 2026 Next Review Date: March 1, 2027

This document is submitted in compliance with 47 C.F.R. Section 64.6305 and related FCC regulations governing the Robocall Mitigation Database.