



Thrive Operations, LLC Robocall Mitigation Plan

Business Information

Thrive Operations, LLC
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Contact Information

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Overview

Pursuant to the Federal Communication Commission's ("FCC") release titled *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking – WC Docket No. 17-97* ("Sixth Order") and 91 Fed. Reg. 343 (to be codified at 47 C.F.R. pts. 1 & 64) titled *Improving the Effectiveness of the Robocall Mitigation Database; CORES Registration System*, Thrive Operations, LLC (herein "Thrive") has developed this Plan to effectively comply with these requirements. Specifically, the Sixth Order states that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that outline "reasonable steps" taken to avoid originating illegal robocalls. Additionally, the requirements state that a RMP should include:

- "Know Your Customer" ("KYC") procedures;
- A description of any call analytics system used to identify and block illegal traffic; and
- Whether a third-party vendor is used and, if so, the name of the vendor.

The FCC has also stated that a RMP is sufficient if the practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Thrive Description

Thrive is a Managed IT Services, Cloud, and Cybersecurity provider that resells third-party vendor VoIP service offerings to our clients. Client voice traffic does not traverse Thrive's network and Thrive only provides end user support service to these clients. Furthermore, Thrive has no access to or control over the infrastructure necessary to implement STIR/SHAKEN protocols. As such, Thrive is not required to be STIR/SHAKEN compliant. Thrive is committed to supporting our upstream providers in carrying out their required mitigation functions to the extent practicable.

Know Your Customer

Thrive does not transmit, originate, and/or terminate calls on behalf of subscribers to any VoIP service. Clients (subscribers) have a business relationship with Thrive and Thrive correspondingly has a business relationship with upstream providers that provision the VoIP services and



connections to the wider telephone infrastructure. Therefore, in support of the KYC component defined within RMP requirements, Thrive has implemented affirmative procedures to ensure the clients subscribing to the services are reputable and that there is no reasonable basis to conclude that the client participates in illegal robocalling practices. Thrive KYC practices may include confirming incorporation status through state business registries, checking domain ownership, maintaining regular contact with the client, and reviewing the client's website and business materials / business model. Any change in the contract status, or if Thrive becomes aware of a change in the client's business model or registration status, may trigger additional reviews by Thrive.

Upstream Providers

Thrive currently maintains business relationships with three upstream VoIP service providers:

Altigen Communications, Inc.
39899 Balentine Drive, STE 112
Newark California, 94560
ATTN: Steve Thompson
Manager of Cloud Operations and Engineering
669.777.4109
sthompson@altigen.com

8x8, Inc.
675 Creekside Way
Campbell, CA 95008
ATTN: Brendan Kasper
Associate General Counsel
646.751.7323
Brendan.kasper@8x8.com

Momentum Telecom
One Concourse Parkway, NE
Suite 600
Atlanta, GA 30328
ATTN: Network Operations Department
877.440.1989
tracebackcompliance@momentumtelecom.com

Thrive has confirmed these providers are registered in the RMD and have completed appropriate disclosure related to compliance with STIR/SHAKEN protocols as applicable. Thrive has ongoing business relationships with these partners and will work with them to implement any mitigation measures applicable to Thrive's service offerings as required.

Telephone Number Analytics

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes and is uniquely associated with the subscriber. Thrive does not directly manage subscriber TNs and therefore does not provide the capability to monitor or validate these identifiers.



Traffic Analytics

Thrive does not have access to or manage the traffic between the subscribers and suppliers and therefore does not have capabilities to conduct traffic monitoring or analytics. Traffic monitoring is conducted by upstream providers.

Investigations of Suspicious Activity

Although Thrive does not have capabilities to conduct monitoring or analytics for suspicious activity, Thrive will work with upstream providers to the extent possible if notified of any investigations or remedial actions required to address suspicious activity.

Plan Updates

Thrive will continue to monitor industry best practices and related rulemaking activity to evaluate and implement any applicable updates to this Plan.



Thrive Officer Certification

I, William Gibbons, SVP of IT and CISO of Thrive Operations, LLC (“Thrive”) to hereby certify, under penalty of perjury, the following:

1. Thrive resells VoIP services to clients through business partnerships with upstream service providers. Thrive does not have access to or manage any infrastructure involved in providing VoIP services as required to implement STIR/SHAKEN protocols, and therefore has not implemented STIR/SHAKEN protocols within Thrive’s network.
2. Thrive’s business name and primary address are as follows:
Thrive Operations, LLC
25 Forbes Blvd., Suite 3
Foxborough, MA 02035
3. Thrive’s informal DBA is Thrive Networks and previous entity’s name was CITS, LLC.
4. Thrive has not previously used any other DBA names.
5. No natural person owns more than 10% of Thrive.
6. Thrive has multiple international affiliates which are not subject to this Plan.
7. Neither Thrive nor any of the people listed herein have been subject to FCC enforcement proceedings or have been forbidden to file in the Robocall Mitigation Database.
8. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above Plan.
9. Thrive’s role in the call chain is that of a reseller and does not directly provision or provide any services to clients and therefore does not have a STIR/SHAKEN obligation.

DATE: 2/6/2026

SIGNED: *William Gibbons*

TITLE: SVP of IT and CISO