



Finerr LLC DBA Finerr Robocall Mitigation Plan

1. Business Information

Company Name: Finerr LLC dba Finerr

Primary Address: 1 Meadowlands Plaza Suite 200, East Rutherford, NJ 07073, USA

Contact Person: Jimish Sheth

Title: Founder & CEO

Date: March 25, 2026

2. Overview and Purpose

Finerr LLC dba Finerr ("Finerr") is a voice service provider (VSP) dedicated to the healthcare industry. In accordance with the FCC's Sixth Report and Order (38 FCC Rcd. 2573), Finerr has implemented this Robocall Mitigation Plan (RMP) to outline the "reasonable steps" taken to avoid originating illegal robocalls. As certified in the FCC's Robocall Mitigation Database, Finerr has fully implemented STIR/SHAKEN.

3. Know Your Customer ("KYC") Procedures

Finerr maintains a rigorous onboarding process for all subscribers to ensure traffic originates from legitimate healthcare entities. This involves collecting the following:

- Federal Tax ID and legal business name.
- Physical business location and contact personnel.
- Nature of the customer's business and intended use of services.
- Verification that services will not be used for illegal robocalling.

4. Know Your Upstream Providers

Finerr partners with reputable upstream carriers compliant with FCC Robocall Mitigation standards. We conduct annual reviews to ensure these carriers are listed as compliant in the FCC database. We maintain assurances that they will continue to sign calls and abide by STIR/SHAKEN rules.

5. Traffic Monitoring and Analytics

Finerr utilizes internal monitoring to analyze Call Detail Records (CDR) for patterns consistent with illegal robocalling. Monitoring criteria include:

- Unusual spikes in call volume or high call-per-minute ratios.
- High volumes of short-duration calls and low answer-to-attempt ratios.
- Calls at times inconsistent with the customer's Finerr business profile.
- Use of non-validated Caller IDs or unverified sources.

6. Investigation and Mitigation

When suspicious activity is detected, Finerr takes the following steps:

1. Immediately contact the customer to verify the intent and legitimacy of the traffic.
2. Block or throttle traffic if it is deemed illegal or violates our Acceptable Use Policy.
3. Terminate service for verified violations.

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7. Traceback Cooperation

Finerr is committed to responding to traceback requests from the Industry Traceback Group (ITG), the FCC, and law enforcement. We commit to providing full responses within 24 hours.

8. Certification

I, Jimish Sheth, Founder & CEO of Finerr LLC, dba Finerr, do hereby certify, under penalty of perjury, that Finerr has fully implemented STIR/SHAKEN. Finerr has not been subject to any Commission or law enforcement action due to suspected involvement with illegal robocalling in the prior two years

Signature: /Jimish Sheth/

Date: March 25, 2026