

ConversionIQ Inc – Robocall Mitigation Plan

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Company Name: ConversionIQ Inc

FCC Registration Number (FRN): 0038333183

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1. Overview and Network Architecture ConversionIQ Inc. is a non-facilities-based Voice Service Provider. We do not own or operate the underlying network infrastructure used to originate or terminate voice calls. Instead, we rely on our underlying carrier, Bandwidth Inc., to route our traffic to the Public Switched Telephone Network (PSTN). Because we do not control the underlying network, we are unable to obtain a Service Provider Code (SPC) token to directly sign calls with STIR/SHAKEN. We rely on Bandwidth to authenticate and sign the calls we originate using the STIR/SHAKEN framework on our behalf.

2. "Know Your Customer" (KYC) Practices To ensure our services are not used for illegal robocalling or caller ID spoofing, ConversionIQ Inc. strictly vets all new clients before granting them access to our voice services. Our onboarding process to activate voice services, clients must complete the following steps:

1. **Business Information Verification:** Provide and verify the official physical business address, main contact information, and the specific intended use-case for the voice services.
2. **Identity Verification:** Verify the identity of the principal business owners or the primary account administrators.
3. **Website Verification:** Confirm the validity of the client's business website.
4. **Payment Method:** A valid credit card must be added to the client's account within our platform.
5. **Use Case Approval (The Campaign Registry):** Ensure all use cases are submitted, valid, and approved within The Campaign Registry.

3. Terms of Service and Contractual Obligations All clients must agree to our Terms of Service (TOS) before utilizing our platform. Our TOS explicitly prohibits the use of our services for illegal robocalling, telemarketing violations, spam, or unauthorized caller ID spoofing. Clients are legally bound to comply with the Telephone Consumer Protection Act (TCPA) and all applicable FCC regulations.

4. Monitoring and Mitigation We actively monitor our traffic for suspicious volume spikes, unusual short-duration call patterns, and invalid caller ID usage that may indicate illegal robocall activity. Furthermore, we rely on the network-level monitoring and Do Not Originate (DNO) blocking mechanisms provided by our underlying carrier, Bandwidth, to identify and stop malicious traffic.

5. Disciplinary Action If ConversionIQ Inc. discovers that a client is originating illegal robocalls, or if we receive a notification from Bandwidth or law enforcement regarding fraudulent traffic originating from one of our accounts, we will take immediate action. This includes immediately suspending the client's voice capabilities, investigating the traffic, and permanently terminating the account if a violation is confirmed.

6. Traceback Cooperation ConversionIQ Inc. commits to cooperating fully and responding within 24 hours to all traceback requests from the FCC, U.S. law enforcement agencies, and the official Industry Traceback Consortium (ITG). We will work swiftly with Bandwidth to identify the source of any contested traffic.