

Robocall Mitigation Plan for Contactivity

Introduction

Contactivity is committed to combatting the spread of illegal robocalls, in accordance with FCC rules and regulations and the TRACED Act. The purpose of this Robocall Mitigation Plan (RMP) is to outline our procedures and protocols designed to prevent the origination of illegal robocalls through our network.

Policy

Contactivity has a firm policy against illegal robocalls. We do not originate, promote, or condone the use of robocalls in violation of FCC rules or regulations, and we take diligent efforts to prevent such calls from being made through our network.

Customer Due Diligence

Contactivity thoroughly vets its customers before providing services. Our customer due diligence measures include:

1. Confirming the legal existence and good standing of the business through documentation.
2. Gathering and verifying contact information for all customers.
3. Conducting an evaluation of a customer's past compliance with telecom regulations and any history of robocalls.
4. Ensuring the customer agrees to comply with our policy against illegal robocalls as a part of their terms of service.

Monitoring and Enforcement

Contactivity will actively monitor traffic patterns for signs of potential illegal robocall activity. In the event we identify suspicious activity, we will investigate and take appropriate action, up to and including termination of service for non-compliance with our policy against illegal robocalls.

Investigation of Complaints

Contactivity is committed to promptly and thoroughly investigate all complaints related to illegal robocalls originating from our network. We cooperate fully with law enforcement and regulatory bodies in any investigations related to such complaints.

As part of this commitment, Contactivity will participate in traceback efforts initiated by the FCC, law enforcement, or the USTelecom Industry Traceback Group. If we are identified as the originating provider in a traceback investigation, we pledge to cooperate fully and provide all necessary information to facilitate the investigation.

Traceback investigations are crucial tools in identifying and taking action against the originators of illegal robocalls. Contactivity is dedicated to contributing to these efforts and helping to hold those responsible for illegal robocalls accountable for their actions. By participating actively in traceback investigations, we can work together with regulators and industry partners to combat the nuisance of illegal robocalls.

Staff Training

All Contactivity staff members receive training on our policies and procedures related to preventing the origination of illegal robocalls through our network. This includes recognizing potential red flags and understanding the steps to take if they suspect illegal robocall activity.

Stir/Shaken

Contactivity is fully compliant with FCC rule against spoofing Caller ID, our switch has ability to identify call spoofing and block caller id spoofing. We only allow calls to be originated from our network from Caller IDs which are bought from us or if not bought from us then they are validated before Attesting (Attestation - B) each call.

Do-Not-Originate (DNO) List Compliance

Contactivity Corp implements and enforces strict Do-Not-Originate (“DNO”) compliance measures to prevent the use of invalid, unassigned, unallocated, or otherwise prohibited originating telephone numbers on its network.

As part of our robocall mitigation framework:

1. DNO List Integration

Contactivity Corp maintains and utilizes industry-recognized Do-Not-Originate lists, including but not limited to numbers identified by regulators, industry partners, traceback authorities, and numbering administrators as invalid, unused, or prohibited for origination.

2. Traffic Screening & Controls

Outbound call traffic is subject to automated and manual monitoring designed to identify calls originating from numbers appearing on DNO lists. When such activity is detected, appropriate mitigation actions are taken, including call blocking, traffic suspension, or

customer escalation.

3. Customer Obligations

Customers are contractually prohibited from originating calls using DNO-listed numbers, invalid caller IDs, or numbers they do not own or have lawful authorization to use.

Customers must ensure that all originating numbers are valid, assigned, and compliant with applicable FCC rules.

4. Enforcement Actions

If DNO violations are identified, Contactivity Corp may take immediate action, including but not limited to:

- Blocking or filtering affected traffic
- Requiring corrective action from the customer
- Suspending or terminating service for repeated or willful violations

5. Traceback & Regulatory Cooperation

Contactivity Corp cooperates fully with traceback requests related to DNO violations and will promptly provide relevant call detail records and customer information to the FCC, law enforcement agencies, or the USTelecom Industry Traceback Group when required.

These DNO compliance measures are a critical component of Contactivity Corp's commitment to preventing illegal robocalls and protecting the integrity of the U.S. telecommunications network.

Review and Revision

This RMP is subject to ongoing review and will be revised as necessary to adapt to changing circumstances or rules and regulations. We remain committed to staying up to date with best practices in the industry and regulatory changes from the FCC.