

ROBOCALL MITIGATION PLAN

Power Fluent LLC

FCC Robocall Mitigation Database Filing
Pursuant to 47 CFR § 64.6305

1. Company Information

Company Name	Power Fluent LLC
Entity Type	Limited Liability Company
State of Formation	Florida
Principal Address	5201 West Kennedy Blvd, Suite 205, Tampa, FL 33609
D.C. Agent Address	1100 H Street, N.W., Suite 840, Washington, DC 20005
FCC Contact	Brad Morgan, Manager
Contact Phone	407-963-4966
Contact Email	brad@powerfluent.io
Effective Date	May 2026

2. Nature of Telecommunications Services

Power Fluent LLC is a voice service provider and telecom reseller operating as an Interconnected VoIP provider, Local Reseller, and Toll Reseller. The company provides outbound voice termination and related telecommunications services to business customers, with a focus on outbound calling solutions including dialer-based outbound call center operations.

Power Fluent LLC does not currently possess the technical capability to fully implement the STIR/SHAKEN call authentication framework as defined under 47 CFR § 64.6301. Accordingly, Power Fluent LLC hereby submits this Robocall Mitigation Plan as an alternative means of preventing its network from being used to originate illegal robocalls, consistent with 47 CFR § 64.6305.

3. STIR/SHAKEN Implementation Status

Power Fluent LLC acknowledges the FCC's STIR/SHAKEN mandate under 47 CFR Part 64, Subpart FF. As a newly formed voice service provider and reseller that does not currently control the call-originating infrastructure, Power Fluent LLC relies on its upstream wholesale carrier(s) to implement STIR/SHAKEN call signing at the origination level.

Power Fluent LLC commits to the following:

- Actively pursue and obtain direct STIR/SHAKEN signing capability as the company's infrastructure matures
- Select and maintain relationships exclusively with upstream carriers that are STIR/SHAKEN compliant and registered in the FCC's Robocall Mitigation Database
- Monitor STIR/SHAKEN attestation levels for traffic transiting Power Fluent LLC's network
- Implement full STIR/SHAKEN signing no later than required by applicable FCC deadlines or upon obtaining the technical capability to do so, whichever is sooner

4. Robocall Mitigation Measures

In lieu of full STIR/SHAKEN implementation, Power Fluent LLC has adopted the following affirmative robocall mitigation measures:

4.1 Customer Onboarding and Know Your Customer (KYC)

- All prospective customers must complete a formal onboarding process that includes verification of business identity, intended use of telecommunications services, and compliance with applicable federal and state telemarketing laws
- Power Fluent LLC will not knowingly onboard customers who intend to use the service to originate illegal robocalls, spoofed calls, or calls that violate the Telephone Consumer Protection Act (TCPA)
- Customers are required to execute a Terms of Service agreement that explicitly prohibits use of Power Fluent LLC's services to originate illegal robocalls

4.2 Traffic Monitoring and Anomaly Detection

- Power Fluent LLC will monitor call traffic patterns on an ongoing basis to identify anomalies indicative of illegal robocall activity, including but not limited to: unusual call volume spikes, high call abandonment rates, sequential number dialing patterns, and spoofed caller ID
- Suspicious traffic will be flagged for manual review by a designated compliance officer
- Power Fluent LLC will implement call volume thresholds and rate limiting controls to prevent mass automated dialing without prior authorization

4.3 Caller ID and Number Management

- Power Fluent LLC will ensure that all calls originating on its network present a valid, non-spoofed caller ID that accurately reflects the calling party

- Customers will be prohibited from using caller ID numbers that they do not own or are not authorized to use
- Power Fluent LLC will audit its assigned and ported number inventory on a regular basis to ensure proper assignment and usage
- Power Fluent LLC will cooperate fully with the FCC's reassigned numbers database (RND) requirements to prevent calls to reassigned numbers

4.4 Do-Not-Call (DNC) Compliance

- Power Fluent LLC requires all customers engaged in outbound telemarketing to maintain current National Do Not Call Registry subscriptions and to scrub call lists against the registry prior to each calling campaign
- Customers are contractually required to comply with the Telephone Consumer Protection Act (TCPA), the Telemarketing Sales Rule (TSR), and all applicable state do-not-call laws
- Power Fluent LLC will maintain records of customer DNC compliance certifications

4.5 Response to Traceback Requests

- Power Fluent LLC commits to respond to all traceback requests from the Industry Traceback Group (ITG) or the FCC within 24 hours of receipt
- Power Fluent LLC will maintain call detail records (CDRs) sufficient to support traceback investigations for a minimum of 18 months
- Upon identification of a customer originating illegal robocalls, Power Fluent LLC will take immediate action including suspension or termination of service

4.6 Upstream Carrier Due Diligence

- Power Fluent LLC will only establish interconnection arrangements with upstream voice service providers that are registered in the FCC Robocall Mitigation Database
- Prior to establishing any new upstream carrier relationship, Power Fluent LLC will verify the carrier's RMD registration status
- Power Fluent LLC will periodically review upstream carrier RMD registrations and terminate relationships with any carrier that fails to maintain registration

5. Customer Enforcement and Consequences

Power Fluent LLC's Terms of Service include the following enforcement provisions for customers found to be originating illegal robocalls:

- Immediate suspension of service upon confirmation of illegal robocall activity
- Permanent termination of service for repeat violations or egregious violations
- Reporting of violations to the FCC, FTC, and applicable state regulators
- Cooperation with law enforcement investigations
- Pursuit of contractual remedies including liquidated damages where applicable

6. Designated Compliance Officer

Power Fluent LLC has designated the following individual as the primary point of contact for robocall mitigation compliance matters:

Name	Brad Morgan
Title	Manager
Phone	407-963-4966
Email	brad@powerfluent.io
Address	5201 West Kennedy Blvd, Suite 205, Tampa, FL 33609

The Compliance Officer is responsible for overseeing implementation of this Robocall Mitigation Plan, responding to traceback requests, investigating complaints, and updating this plan as required by changes in law or company operations.

7. Plan Review and Updates

Power Fluent LLC will review and update this Robocall Mitigation Plan on an annual basis, or more frequently as required by:

- Changes in FCC rules or guidance regarding robocall mitigation
- Material changes to Power Fluent LLC's network infrastructure or service offerings
- Identification of new robocall threats or mitigation techniques
- Directives from the FCC or Industry Traceback Group

Updated plans will be filed promptly with the FCC Robocall Mitigation Database at fccrobcalldatabase.com.

8. Certification

I, Brad Morgan, Manager of Power Fluent LLC, hereby certify that the information contained in this Robocall Mitigation Plan is true, accurate, and complete to the best of my knowledge. I further certify that Power Fluent LLC is committed to implementing and maintaining the robocall mitigation measures described herein and to complying with all applicable FCC rules regarding the prevention of illegal robocalls.

Signature: Brad Morgan

Printed Name: Brad Morgan

Title: Manager, Power Fluent LLC

Date: 2026-04-01