

ROBOCALL MITIGATION PROGRAM

Adoptiv Inc.

FCC Registration Number (FRN): 0038538815

1. Filer Information

Adoptiv Inc. ("Adoptiv") is a domestic United States voice service provider located at 2810 N Church St, STE 88783, Wilmington, DE 19802, United States. Adoptiv's FCC Registration Number (FRN) is 0038538815. Adoptiv does not hold an Operating Company Number (OCN). Adoptiv provides AI-assisted voice communications services to business end-user customers, originating outbound calls and receiving inbound calls. Adoptiv obtains call origination and termination and telephone numbering resources through underlying wholesale carrier partners and does not operate its own public switched telephone network facilities. All of Adoptiv's traffic is domestic; Adoptiv does not accept calls directly from foreign providers and performs no gateway function. For purposes of this filing, Adoptiv is a Voice Service Provider that originates calls and serves end users.

2. STIR/SHAKEN Status

Adoptiv is a newly operational provider. The underlying wholesale carriers through which Adoptiv originates traffic participate in the STIR/SHAKEN caller identification authentication framework and authenticate (sign) calls in the IP portions of the network. Adoptiv has not yet obtained its own Service Provider Code (SPC) token, which requires an OCN. Adoptiv is pursuing the necessary prerequisites, including a Form 499-A filer identification and an OCN, and will implement STIR/SHAKEN authentication for the calls it originates as soon as it is eligible to do so. Pending and alongside that implementation, Adoptiv maintains the robocall mitigation program described below, which applies to all calls Adoptiv originates.

3. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

3.1 Know-Your-Customer due diligence. Before enabling any customer to originate calls, Adoptiv verifies the customer's identity and legitimacy, including confirming the legal business name and registration, collecting a valid business identifier (e.g., EIN) and physical address, identifying an authorized contact, and documenting the customer's intended use case, calling campaigns, and expected call volumes. Adoptiv screens prospective customers against publicly available information regarding known robocall and fraud actors and declines or escalates high-risk applicants.

3.2 Acceptable Use Policy and contractual commitments. Every customer must agree to Adoptiv's Acceptable Use Policy and service terms, which prohibit the origination of unlawful robocalls and any calls that violate the Telephone Consumer Protection Act (TCPA), the Telemarketing Sales Rule, or FCC rules; require the customer to obtain and retain any legally required prior express (or prior express written) consent before placing calls; prohibit caller ID spoofing and the transmission of inaccurate, false, or misleading caller identification; require honoring do-not-call requests and consumer opt-outs; and require the customer to use only telephone numbers it is authorized to use.

3.3 Caller ID and consent integrity. Adoptiv requires customers to transmit accurate and valid caller identification on every call and to use numbers legitimately assigned to them. Adoptiv's platform supports consumer opt-out handling and requires customers to maintain records demonstrating consent for the calls they place, which the customer must produce upon request.

3.4 Monitoring and analytics. Adoptiv monitors traffic for indicators of illegal robocalling, including abnormal call volumes, high short-duration-call ratios, low answer or completion rates, sudden spikes in a customer's traffic, and complaint or block-list signals. Adoptiv reviews notices and analytics made available by its underlying carriers and acts on any traceback or abuse notifications it receives.

4. Response to Traceback Requests

Adoptiv is committed to responding fully and within 24 hours to all traceback requests it receives from the Commission, law enforcement, and the USTelecom Industry Traceback Group (ITG). Adoptiv maintains call detail records sufficient to identify the upstream source or the originating customer of any call that is the subject of a traceback, and will provide that information promptly. Adoptiv has designated a robocall mitigation point of contact, identified in Section 8 and in this filing, to receive and act on traceback requests.

5. Mitigation of Identified Illegal Traffic

When Adoptiv learns — through a traceback, a notification from the Commission or law enforcement, its own monitoring, or otherwise — that a customer is or may be originating illegal robocall traffic on its network, Adoptiv will promptly investigate and, where warranted, take effective mitigating action, up to and including warning, rate-limiting or throttling, blocking specific traffic, suspending, or terminating the offending customer. Adoptiv documents the actions it takes. Adoptiv will not knowingly originate, and will act to stop originating, illegal robocall traffic.

6. Preventing New and Renewing Customers from Originating Illegal Calls

Adoptiv applies the Know-Your-Customer and Acceptable Use requirements described above to all new customers at onboarding and re-evaluates customers upon renewal and whenever risk indicators arise. Adoptiv reserves the contractual right to audit customer compliance and to suspend or terminate customers who violate its policies or applicable law.

7. Cooperation with Enforcement

Adoptiv will cooperate fully with the Commission, law enforcement agencies, and the ITG in the investigation and pursuit of entities that originate illegal robocalls, including by providing information that helps trace and identify the source of suspect traffic.

8. Robocall Mitigation Point of Contact

Name: Ritesh Kumar

Title: Chief Executive Officer

Telephone: +1 (765) 737-0086

Email: ritesh@adoptiv.com

9. Review and Updates

Adoptiv will review and update this robocall mitigation program as its operations evolve, including upon completing STIR/SHAKEN implementation, and will revise its Robocall Mitigation Database filing as required and recertify annually by March 1.

Submitted on behalf of Adoptiv Inc. by Ritesh Kumar, Chief Executive Officer. This robocall mitigation program is maintained pursuant to 47 CFR § 64.6305 and 47 CFR § 64.1200(n).