

ROBOCALL MITIGATION PLAN

VERTICAL FISH AI LLC

Filed Pursuant to 47 C.F.R. § 64.6305

1.0 Introduction & Scope

Vertical Fish AI LLC ("The Company") operates a proprietary outbound communications platform utilizing live agents and/or advanced artificial voice functionality. This Robocall Mitigation Plan (RMP) outlines the high-level policies, protocols, and operational frameworks established by the Company to prevent the generation, origination, or transmission of illegal robocalls, deceptive caller identification spoofing, or non-compliant voice traffic across its platform. Vertical Fish AI LLC does not originate, permit, or tolerate any illegal robocall traffic on its network. All voice traffic originating via the Company's infrastructure is strictly subject to the mitigation, vetting, and enforcement procedures detailed herein.

2.0 STIR/SHAKEN Implementation Status

The Company has fully implemented the STIR/SHAKEN caller identification authentication framework across its network architecture in strict compliance with **47 C.F.R. § 64.6301**. The Company maintains an active registration with the Secure Telephone Identity Policy Administrator (STI-PA), possesses an authorized Service Provider Code (SPC) token, and utilizes an approved third-party Certificate Authority to cryptographically sign outbound voice traffic. All calls originated by the Company are signed to **Full Attestation (Level A)**, affirming that the Company is both the originating service provider and has a direct relationship with the customer initiating the call, and that the customer is authorized to use the telephone number presented as the caller ID.

3.0 Artificial Voice & Opt-Out Compliance

In strict accordance with **47 C.F.R. § 64.1200(b)**, all artificial or prerecorded voice traffic originated via the Company's platform explicitly discloses the legal identity and telephone contact information of the calling entity at the outset of the transmission. Every call features an automated, interactive voice- and/or key-press-activated opt-out mechanism. Brief, clear explanatory instructions on utilizing the mechanism are programmatically provided to the called party within the legally mandated two (2) second window following the initial identity disclosure. All on-call opt-out requests are processed automatically and immediately by the platform, and internal suppression/Do-Not-Call lists are updated **within 30 days** and well within standard federal compliance timelines.

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4.0 Know Your Customer (KYC) & Onboarding Vetting

The Company maintains comprehensive, personally reviewed Know Your Customer (KYC) onboarding protocols designed to guarantee identity verification and regulatory alignment before network access is provisioned. The Company collects, reviews, and validates foundational customer identifiers, including but not limited to:

- Legal Entity Name, registered trade names, and valid DBAs.
- Authorized Corporate Representative identity and contact information.
- Verified Physical Business Address and Federal Tax Identifiers (EIN/SSN).
- Intended calling use cases, campaign content descriptions, and necessary regulatory certifications.

The Company maintains these onboarding records for the legally required retention periods. Furthermore, the Company explicitly mandates via binding corporate terms and acceptable use policies that all platform users strictly adhere to the Telephone Consumer Protection Act (TCPA), the TRACED Act, and all applicable state and federal telemarketing regulations.

Vertical Fish implements these controls through documented procedures that are applied consistently but allow for Compliance Officer discretion in complex cases. All decisions are logged with supporting rationale.

The Company reserves the right to request additional information or reject any applicant at its discretion.

5.0 Proactive Traffic Monitoring & Enforcement

The Company utilizes automated internal analytics and network monitoring systems to continuously evaluate outbound traffic patterns for anomalies indicative of non-compliant or illegal robocall activity. Monitoring parameters include, but are not limited to, uncharacteristic call volumes, abnormal short-duration call spikes, and excessive call retries to invalid network destinations.

In the event that internal traffic monitoring, upstream carrier alerts, or regulatory notifications suggest potentially non-compliant calling behavior, the Company initiates an immediate investigation. The Company maintains the absolute contractual and operational right to preemptively suspend, restrict, or permanently terminate network access for any client or campaign found to be violating applicable laws, platform policies, or telemarketing standards.

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6.0 Industry Traceback & Cooperation Commitment

Vertical Fish AI LLC commits to fully, completely, and rapidly responding to all lawful traceback requests from the Federal Communications Commission (FCC), federal and state law enforcement agencies, and the designated Industry Traceback Group (ITG). The Company dedicates continuous operational resources to ensure that all valid traceback inquiries are thoroughly investigated, answered, and resolved within a strict **24-hour response window**. The Company maintains a comprehensive call logging architecture to facilitate rapid data retrieval and efficient cooperation with enforcement authorities.

7.0 Plan Maintenance and Updates

The Company continuously monitors evolving regulatory rulings, technological advancements, and industry best practices to ensure this plan adapts to the dynamic telecommunications landscape. This RMP is evaluated regularly and will be modified as necessary. Updated plans will be executed and submitted through the Commission Registration System within **10 business days** of any material change to the Company's operational, technical, or corporate filing structure, in accordance with 47 C.F.R. § 64.6305(c).