

Robocall Mitigation Program Description

Raise More, Inc.

FCC Registration Number (FRN): 0038716619

Business Address: 221 W 9th St, # 924, Wilmington, DE 19801, United States

Provider Type: Voice Service Provider

STIR/SHAKEN Status: No STIR/SHAKEN Implementation — Performing Robocall Mitigation

Date: July 29, 2026

Raise More, Inc. ("Raise More") provides a fundraising CRM used by political campaigns, party committees, advocacy organizations, and nonprofits. Raise More originates outbound voice traffic solely through its underlying wholesale carriers, which authenticate that traffic under the STIR/SHAKEN framework. Raise More does not itself hold a Service Provider Code token and therefore maintains the robocall mitigation program described below.

Basis for exemption from 47 CFR § 64.6301

Raise More claims the exemption at **47 CFR § 64.6304(b)**, which provides that voice service providers incapable of obtaining a Service Provider Code (SPC) token due to Governance Authority policy are exempt from the requirements of § 64.6301 until they are capable of obtaining an SPC token.

STIR/SHAKEN Governance Authority policy conditions issuance of an SPC token on the applicant having a current FCC Form 499A on file with the Commission and an Operating Company Number (OCN) assigned by the National Exchange Carrier Association. Raise More is not a Form 499A filer and holds no OCN. It is therefore incapable of obtaining an SPC token, and consequently cannot obtain the STI certificate required to authenticate calls under § 64.6301. Raise More does not operate its own call authentication infrastructure. Raise More will implement the STIR/SHAKEN authentication framework if and when it becomes capable of obtaining an SPC token.

1. No automated or prerecorded calling capability

Raise More's platform does not include, and has never included, a predictive dialer, an autodialer, a ringless voicemail facility, or any capability to deliver artificial or prerecorded voice messages. Every outbound call originated through the platform is individually initiated

by a human user who remains on the line for the duration of the call. Calls are placed one at a time from a displayed contact record. This architectural constraint eliminates the principal vector for illegal robocalling.

2. Know Your Customer

Raise More onboards every customer through a manually administered process with no self-service or anonymous account creation for outbound voice. Before an account is provisioned, Raise More executes a written services agreement, verifies the identity of the authorized signer, and confirms the customer's registration as a political committee with the Federal Election Commission or the corresponding state authority. Raise More's customer base consists of identifiable political committees, candidate campaigns, party organizations, advocacy groups, and nonprofits. Raise More does not resell origination capacity to downstream carriers, wholesale intermediaries, or unaffiliated resellers.

3. Caller identity verification

Every telephone number used as an outbound caller ID must be verified before it can originate traffic. Raise More verifies a customer's right to use a number through a one-time passcode challenge delivered by the underlying carrier to that number, and refuses origination from any unverified number. Numbers provisioned directly through Raise More are obtained from its underlying carriers and registered to the customer's business profile with those carriers, which supports full attestation of the resulting traffic.

4. Do-not-contact enforcement

Raise More maintains do-not-contact status per contact record and enforces it server-side at the moment of dialing. A call to a contact with active do-not-contact status is rejected by the platform and never reaches the carrier. Enforcement extends across affiliated parent and child organizations, so a suppression recorded by one committee is honored by its affiliates. Do-not-contact status is set both by user action and by request of the called party.

5. Traffic monitoring

Raise More logs every call attempt, its disposition, and its terminating status code, and retains that record. Raise More operates automated monitoring against its carrier accounts and conducts a documented monthly review of call detail for indicators of illegal traffic, including anomalous call volume, abnormally short average call duration, elevated invalid-number rates,

and elevated failure or rejection rates. Anomalies surfaced by automated monitoring are investigated when detected rather than deferred to the monthly review. Raise More escalates to account suspension where warranted.

6. Traceback cooperation

Raise More will fully and promptly respond to all traceback requests from the Industry Traceback Group, the Commission, and law enforcement, and will respond within 24 hours of receipt. Raise More maintains the contact designated in this certification for that purpose and monitors it continuously.

7. Contractual prohibition and enforcement

Raise More's customer agreement and acceptable use policy prohibit use of the platform for any unlawful communication, including any call placed in violation of the Telephone Consumer Protection Act, the Telemarketing Sales Rule, or applicable state law, and require customers to maintain any consent required for the calls they place. Raise More reserves the right to suspend or terminate any customer that originates illegal traffic. Upon determining that a customer has originated illegal traffic, Raise More will promptly cease carrying that customer's traffic and terminate the account.

8. Affirmative obligation not to originate illegal traffic

Raise More does not originate, and will not originate, illegal robocall traffic. Raise More takes affirmative, effective measures to prevent customers from using its network to originate illegal calls, as described above.