

McLEOD SOFTWARE CORPORATION

Robocall Mitigation Program Description

Prepared for submission to the FCC Robocall Mitigation Database

August 17, 2026

Legal name	Tom McLeod Software Corporation
Business	Transportation management software provider
Business address	100 Corporate Parkway, Birmingham, AL 35242
FCC Registration Number	0038775953
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Upstream voice provider	Bandwidth Inc.

Review note: This draft reflects the currently described architecture and operating model. Telecom counsel and Bandwidth Compliance should confirm the filer classification, rule citation, commitments, response periods, and retention language before submission.

1. Purpose and Scope

This Robocall Mitigation Program Description explains the controls Tom McLeod Software Corporation ("McLeod Software") uses to prevent, detect, investigate, and stop illegal robocalls, unlawful caller ID spoofing, scam traffic, fraudulent calling, unauthorized telemarketing, and other abusive voice traffic associated with voice-enabled workflows offered through McLeod Software products.

The covered functionality supports legitimate transportation and logistics business communications. It includes application-level, AI-assisted inbound and outbound voice workflows related to freight

transportation, dispatch, shipment visibility, carrier coordination, driver support, and other operational transactions.

This document is limited to robocall mitigation practices for the covered voice functionality. It is not a marketing document, product roadmap, or statement that every listed use case is currently generally available.

2. Company and Service Overview

McLeod Software develops transportation management software used by motor carriers, freight brokers, third-party logistics providers, private fleets, and other transportation organizations. Its software supports functions such as dispatch, load and order management, carrier management, driver communications, shipment tracking, exception management, accounting, and customer service.

McLeod Software provides application software and workflow automation. It does not offer the covered functionality as a general-purpose dialing product, consumer calling service, predictive dialer, bulk campaign platform, SIP trunking service, or telecommunications resale service.

3. Provider Role and STIR/SHAKEN Status

Telephone numbers used for the covered voice workflows are provisioned directly by Bandwidth under McLeod Software's account. Bandwidth provides the public switched telephone network (PSTN) connectivity and carrier-level voice services used to connect covered calls to and from the public telephone network.

McLeod Software does not operate its own voice switching network, maintain direct PSTN interconnections, independently control numbering resources, or currently maintain its own Service Provider Code token, STIR/SHAKEN certificate, or STIR/SHAKEN call-signing infrastructure.

To the extent STIR/SHAKEN authentication, call attestation, PSTN interconnection, carrier-level traceback support, network-level traffic analytics, or network-level blocking applies to calls using Bandwidth-provisioned numbers, McLeod Software relies on Bandwidth or another approved upstream voice provider for those carrier-level functions.

McLeod Software will reassess its RMD filing and this program before enabling any materially different voice architecture, direct PSTN interconnection, independent call-signing capability, general-purpose customer-controlled calling outside approved workflows, or other change that could affect its provider classification or STIR/SHAKEN status.

4. Covered Voice Use Cases

Voice access is limited to approved transportation-management workflows for authenticated business customers. Covered calls must relate to legitimate freight transportation or logistics operations.

4.1 Outbound operational workflows

- Requests to carrier dispatch offices or drivers for shipment, pickup, transit, arrival, delivery, detention, delay, or exception updates.
- Pickup or delivery appointment confirmation and operational rescheduling.
- Load acceptance, equipment availability, or dispatch coordination associated with an identifiable freight transaction.
- Follow-up on transportation transactions, missing operational information, or service events recorded in a McLeod Software workflow.
- Operational notifications or requests involving company drivers, lease operators, owner-operators, carriers, shippers, consignees, or other authorized transportation participants.

4.2 Inbound operational workflows

- Driver or lease-operator requests for dispatch assistance, load information, trip instructions, or operational support.
- Shipment status, appointment, routing, settlement-status, or exception-management inquiries.
- Call intake, authentication, information collection, workflow completion, and routing to an appropriate customer representative.

The recipient-facing identity, purpose of the call, and information provided by an AI-assisted workflow must correspond to the customer and transportation transaction for which the workflow is authorized.

5. Prohibited Uses and Acceptable-Use Controls

McLeod Software prohibits use of covered voice functionality for:

- Illegal robocalling, scam traffic, fraudulent calling, harassment, or unlawful caller ID spoofing.
- Mass unsolicited calling, consumer telemarketing, political solicitation, lead-generation campaigns, or calls intended to evade call-blocking or call-authentication systems.
- Predictive dialing, bulk campaign dialing, or high-volume outbound activity outside approved transportation workflows.
- Use of telephone numbers the customer or user is not authorized to use.
- Telecommunications resale, SIP trunk resale, or use of the software as a substitute general-purpose telephony service.
- Continued calling when prohibited by applicable law, a valid opt-out, an applicable do-not-call requirement, or a customer-specific restriction.
- Any calling practice that violates applicable consent, privacy, call-recording, consumer-protection, or other legal requirements.

McLeod Software may restrict unapproved destinations, calling patterns, workflows, account configurations, or caller ID values and may require additional review before enabling higher-risk functionality.

6. Customer Verification and Access Controls

Covered voice functionality is available only to authenticated McLeod Software business customers and authorized users. McLeod Software customers are not anonymous general telephony users.

Depending on the implementation and risk presented, McLeod Software may maintain or review:

- Customer legal name, business contact, contractual and billing relationship, and service address.
- Authorized users, account roles, configured workflows, and relevant customer or transportation-system identifiers.
- Assigned telephone numbers and information supporting authorization to use caller ID resources.
- Intended use case, expected calling patterns or volume, and applicable customer compliance responsibilities.
- Records that associate relevant call activity with a customer account, workflow, transaction, user, or configuration.

McLeod Software may require additional information, restrict activation, re-verify an account, or disable functionality if customer information, proposed use, complaints, or observed activity raises compliance, fraud, or abuse concerns.

7. Number Authorization and Caller ID Controls

Covered calls may use only telephone numbers provisioned by Bandwidth for McLeod Software's approved use or other numbers whose use has been reviewed and authorized. McLeod Software prohibits misleading caller ID information, unauthorized number substitution, and spoofing.

McLeod Software will coordinate with Bandwidth on number provisioning, caller ID configuration, suspected misuse, and any carrier-imposed restrictions applicable to covered traffic.

8. Monitoring, Analytics, and Red Flags

McLeod Software does not rely on this program as a substitute for carrier-level monitoring. Bandwidth provides carrier-level services and may provide network analytics or blocking applicable to covered traffic. At the application layer, McLeod Software may review available call detail records, call or workflow logs, configuration records, account activity, complaints, traceback requests, upstream-provider reports, and security indicators.

Potential red flags may include:

- Unexpected or unexplained increases in call volume.
- High rates of short-duration, unanswered, failed, or repeated calls.
- Calling patterns or destinations inconsistent with the approved transportation use case.
- Complaints, traceback requests, carrier notices, or caller ID irregularities.
- Attempts to alter caller identity, bypass controls, use unauthorized numbers, or enable an unapproved campaign.
- Suspicious credentials, integrations, workflow configurations, or account behavior.

When a red flag is identified, McLeod Software may investigate the account, workflow, transaction, user, configuration, call records, and other information reasonably available to it.

9. Complaint, Traceback, and Regulatory Cooperation

McLeod Software will cooperate with valid investigations and traceback requests from the Federal Communications Commission, law enforcement, the Industry Traceback Group, Bandwidth, and other authorized entities concerning suspected illegal robocalling, spoofing, scam traffic, or misuse associated with covered voice workflows.

For a valid request, McLeod Software will use commercially reasonable efforts to:

- Identify the relevant customer account, telephone number, workflow, transaction, user, or configuration from records reasonably available to McLeod Software.
- Preserve relevant records in McLeod Software's possession or control.
- Coordinate with Bandwidth and other relevant providers.
- Provide a complete response within the response period required by applicable law, FCC rule, or the requesting authorized entity.
- Take interim protective action when necessary to prevent suspected unlawful traffic from continuing.

McLeod Software will maintain an internal escalation path and current contacts for Bandwidth, regulatory inquiries, traceback requests, and abuse reports.

10. Blocking, Suspension, and Remediation

If McLeod Software determines or reasonably suspects that covered functionality is being used for illegal robocalling, spoofing, fraud, unauthorized solicitation, prohibited campaigns, or other misuse, McLeod Software may take one or more actions within its control:

- Disable or modify the affected workflow or integration.
- Restrict outbound calling, destinations, caller ID values, users, credentials, or account access.
- Suspend or terminate the customer's access to covered voice functionality.
- Require re-verification, remediation, additional documentation, or revised configuration.
- Preserve records and notify Bandwidth or another relevant provider.
- Honor applicable carrier blocking, suspension, or traffic restrictions.
- Cooperate with traceback, regulatory, law-enforcement, or legal requests.

The response will be proportionate to the available information, severity, recurrence, and risk of continued unlawful traffic.

11. Upstream Provider Due Diligence and Coordination

Bandwidth is McLeod Software's upstream voice provider for the telephone numbers, PSTN connectivity, and carrier-level services currently contemplated by this program. McLeod Software will maintain appropriate operational, compliance, and abuse contacts for Bandwidth and will coordinate on complaints, traceback requests, suspected spoofing, suspicious traffic, and service restrictions.

Before using a materially different upstream voice provider for covered traffic, McLeod Software will perform reasonable review appropriate to the relationship, including the provider's status in the FCC Robocall Mitigation Database and its support for traceback, complaint handling, and traffic suspension. McLeod Software will not knowingly route covered traffic through a provider that is prohibited from accepting or carrying the traffic under applicable FCC rules.

12. Records and Retention

McLeod Software will maintain records reasonably necessary to administer this program, investigate complaints, associate relevant call activity with customer workflows, support authorized traceback requests, and document remediation. Such records may include customer and authorized-user information, number assignments, configuration and workflow records, available call logs, complaint and investigation records, provider communications, and suspension or termination actions.

Retention periods will be established and maintained in accordance with applicable legal requirements, contractual obligations, McLeod Software record-retention policies, and the operational need to support traceback and investigations.

13. Customer Responsibilities

McLeod Software customers control their transportation operations and must use covered functionality only for lawful, authorized business purposes. Customer responsibilities may include:

- Configuring approved workflows and identifying the transportation transactions or operational events that support a call.
- Maintaining accurate contact information and any consent, permission, contractual, or other legal basis required for the communication.
- Providing required notices, disclosures, and opt-out mechanisms where applicable.

- Complying with applicable federal, state, and local calling, privacy, recording, and consumer-protection requirements.
- Promptly reporting complaints, suspected abuse, unauthorized use, compromised credentials, or incorrect caller ID information.

Customer contractual responsibilities do not limit McLeod Software's right to monitor, investigate, restrict, suspend, or terminate covered functionality under this program.

14. Internal Ownership and Training

McLeod Software will designate internal ownership for this program, traceback response, abuse escalation, product controls, and upstream-provider coordination. Relevant personnel involved in designing, enabling, supporting, or investigating covered voice workflows will be made aware of:

- The limited transportation and logistics purposes permitted by this program.
- Restrictions against illegal robocalling, spoofing, fraud, bulk campaigns, unauthorized telemarketing, and unapproved caller ID use.
- Customer verification, escalation, investigation, evidence-preservation, and remediation procedures applicable to their roles.
- The need to escalate material product, provider, call-flow, or regulatory changes for review.

15. Regulatory History

McLeod Software has not been subject during the period required by the FCC form to a formal FCC, law-enforcement, or regulatory action or investigation relating to illegal robocalls, spoofing, deficient mitigation practices, or RMD filings.

16. Program Review and Filing Updates

McLeod Software will review this program when its voice functionality, upstream providers, telephone-number arrangements, call flows, compliance controls, or provider classification materially changes. It will update its RMD filing and complete required recertifications within the periods required by applicable FCC rules.

Material changes requiring review may include broader outbound functionality, customer-controlled campaigns outside approved workflows, direct PSTN interconnection, independent STIR/SHAKEN signing, a new upstream provider, material changes to monitoring, or a change in the entity responsible for originating or carrying traffic.

17. Certification Statement

McLeod Software is committed to taking reasonable and effective measures to prevent, detect, investigate, and stop illegal robocalls, spoofing, scam traffic, fraudulent calling, and unauthorized telemarketing associated with the covered voice functionality. McLeod Software will verify and control access to covered workflows, monitor information reasonably available to it, cooperate with authorized traceback and investigations, coordinate with Bandwidth, and suspend or terminate abusive use as appropriate.

Authorized representative

Robert Brothers

Title

Vice President Product Development

Signature

Robert Brothers

Date

08/17/2026

FCC Registration Number

0038775953