

Robocall Mitigation Program Description

BROADCAST MEDIA VENTURES LLC

Effective / last updated: September 15, 2026

Field	Value
Legal entity	BROADCAST MEDIA VENTURES LLC
EIN	38-4362459
FCC business FRN	0038868758
FCC Form 499 Filer ID	839271
OCN / Company Code	Not assigned
RMD ID	Not assigned
DBA / assumed name (telecom)	None
Principal / physical address	2501 Chatham Rd, Suite N, Springfield, IL 62704
Mailing address	2501 Chatham Rd, STE #6606, Springfield, IL 62704
Public telephone	888-395-7876
Public email	contact@broadcastmv.com
Traceback / mitigation email	compliance@broadcastmv.com
Website	https://broadcastmv.com
Program owner / certifying officer	Romniel Dela Peña, Manager
Mitigation contact	compliance@broadcastmv.com · 888-395-7876
Foreign voice provider	No
STIR/SHAKEN implementation	Not implemented on any portion of the network (pending)
Live customer voice traffic	None meaningful as of this description — do not claim live traffic
Upstream platform (ops note)	Twilio — no Account SID listed in this filing

1. Scope and objective

Broad Cast Media Ventures LLC ("BCMVB") maintains this robocall mitigation program to prevent its services, telephone numbers, personnel, contractors, customers, and any downstream users of BCMVB-provided voice access from originating, carrying, or transmitting illegal robocalls or calls with unlawfully spoofed caller identification.

BCMVB is a U.S. IP-enabled voice and business messaging provider offering managed SIP voice, live-agent calling support, and consented A2P messaging for **approved business customers**.

Full service description (locked): Broad Cast Media Ventures LLC provides U.S. business communications and managed voice services for approved business customers. Services include inbound and outbound SIP voice, DIDs and toll-free numbers, call routing and failover, Caller ID management, live-agent sales follow-up, lead qualification, customer service, alerts, and related call-handling support. The company also supports approved A2P / 10DLC and other business messaging programs with documented, sender-specific consent. Managed VoIP / connectivity may be provided or resold subject to customer and use-case approval. Traffic is limited to verified business use cases; purchased-list messaging and use of consent captured for another sender are not accepted. Robocall mitigation, STIR/SHAKEN authentication (as implemented), traceback cooperation, and complaint/opt-out handling are part of the operating controls.

This program applies to every call BCMVB originates or transmits and to every account, campaign, number, route, and user with access to BCMVB-provided voice services. Until STIR/SHAKEN is actually implemented for BCMVB (see Section 8), **all** traffic remains subject to the non-STIR controls in this program. The presence or absence of an Identity header is not a substitute for customer verification, lawful-basis review, traffic monitoring, complaint handling, or traceback cooperation.

BCMVB does **not** claim complete or partial STIR/SHAKEN implementation in this filing.

BCMVB does **not** claim live customer voice traffic in this filing.

2. Provider role and network posture

As of this description:

- BCMVB intends to operate as a **domestic voice service provider** offering IP-enabled (IPES) managed SIP voice to approved business customers, and related consented business messaging.
- BCMVB is **not** a gateway provider.
- BCMVB does **not** hold an OCN, STI-PA account, SPC token, or STI-CA certificate in its own name.
- BCMVB has **not** implemented STIR/SHAKEN on any portion of its network.
- BCMVB is **not** originating or carrying meaningful live customer voice traffic.
- Upstream SIP/voice platform noted in operations: **Twilio**. No Twilio Account SID is recorded in this plan (do not invent one). This is **not** a claim of live traffic and is **not** by itself a completed NECA Exhibit B interconnect. When the BCMVB Twilio legal-entity match and SIP trunk/agreement evidence are in hand, this plan and the RMD certification will be updated within **10 business days** if anything material changes.
- Geographic orientation: United States. Principal operations identity is Springfield, Illinois. Jurisdictions actually served will match the FCC Form 499-A Line 227 selection once confirmed.

BCMVB will not reuse another legal entity's identifiers, certificate, filings, brand, or consent evidence.

BCMVB lists **no DBA** on this RMD.

3. Governance and accountability

- The **Manager**, Romniel Dela Peña, owns this program, approves material changes, and has authority to refuse onboarding, suspend traffic, accounts, campaigns, numbers, vendors, or routes, and to terminate access.
- The mitigation / traceback contact (compliance@broadcastmv.com / 888-395-7876) monitors regulatory, complaint, and traceback communications and coordinates responses, record preservation, remediation, and carrier communications. Public contact remains contact@broadcastmv.com.
- Personnel and contractors with calling or network access must follow this program and may use only approved accounts, numbers, platforms, routes, data sources, and call purposes.
- BCMV reviews this program after a material incident or regulatory change and at least annually, recertifies in the Robocall Mitigation Database by **March 1** each year, and updates the RMD filing within **10 business days** of a material change (including STIR/SHAKEN implementation status, contact information, ownership, or named vendors).

This description does not limit additional operational, contractual, or legal controls that may apply.

4. Know-your-customer (KYC) for voice customers

BCMV does not grant unmanaged, anonymous, or "pay-and-dial" voice access. Before activating or materially expanding voice access for a customer, BCMV requires information sufficient to understand **who** will use the service, **what** traffic will be sent, and whether that use is lawful. Review is proportionate to risk and includes, as applicable:

Identity and business verification

- Legal name, physical address, responsible individual, working telephone and email, and business-formation or comparable identity documentation.
- Confirmation that the customer is a business (not an unidentified consumer originator) and that the named authorized user is associated with that business.

Authorized-user and number-authorization checks

- Identification of persons authorized to place or administer calls.
- Evidence of authority to use each calling number (BCMV-assigned DID/toll-free, or customer-provided numbers with documented authorization).
- Prohibition on supplying false, misleading, randomly generated, or unauthorized caller identification.

Intended-use and traffic-profile review

- Nature of the business, intended calling use case, expected volumes, calling hours, geographic footprint, and the relationship among the caller, the called party, and any represented seller.
- Confirmation that the use case is a **verified business** purpose consistent with Section 5 (for example, live-agent sales follow-up, lead qualification, customer service, alerts, or other approved call-handling).
- Expected consent or other lawful basis when outbound campaigns require consent.

High-risk indicators and enhanced review

Additional review, delayed activation, limits, or rejection when information is incomplete, inconsistent, unverifiable, associated with prior complaints or traceback, appears to involve purchased lists or recycled consent, or otherwise presents elevated robocall risk.

Ongoing monitoring and re-verification

- Material changes in use case, volume, calling numbers, or ownership trigger re-review.
- Complaint concentrations, carrier warnings, or traceback activity trigger enhanced review of the implicated customer.

Suspension and termination

BCMV may throttle, block, suspend, or terminate a customer, campaign, number, or route immediately when KYC cannot be substantiated, when illegal or abusive traffic is indicated, or when the customer refuses timely cooperation with traceback or complaint investigation.

5. Permitted traffic; no purchased-list messaging

Traffic on BCMV voice and messaging services is limited to **verified business use cases** for approved customers.

Accepted (subject to KYC and use-case approval): inbound and outbound SIP voice; DIDs and toll-free; call routing and failover; Caller ID management consistent with lawful identity; live-agent sales follow-up; lead qualification; customer service; alerts; related call-handling support; and approved A2P / 10DLC or other business messaging programs **with documented, sender-specific consent**.

Not accepted:

- Purchased, rented, scraped, aged, shared, or affiliate lead lists used as a consent source for messaging or as a substitute for sender-specific consent.
- Use of consent captured for **another sender**.
- Unlawful prerecorded or artificial-voice calls, unlawful autodialed calls, caller-ID spoofing, impersonation, fraud, or evasion of carrier or regulatory controls.
- Unmanaged "list blast" voice or SMS programs.

Third-party lead or consent certificates, if ever presented, are supporting evidence only — not conclusive proof. BCMV may validate the source, disclosure language, seller identity, consumer data, IP and timestamp information, and whether a number may have been reassigned. A source or campaign is suspended when consent cannot be substantiated or credible contrary evidence arises.

Personal-loan / financing marketing is **not** a BCMV telecom brand use case. BCMV's telecom brand and website are Broad Cast Media Ventures LLC / <https://broadcastmv.com> only. **No DBA** is used for telecom or this RMD. Assumed name USA CAPITAL COMPANY is **not** used as the telecom or SMS brand and is **not** listed as a DBA on this filing.

6. Do-not-call, suppression, and opt-out

- Campaign operators and BCMV-operated live-agent programs must maintain records supporting the lawful basis for calls and must honor **company-specific do-not-call** requests and applicable federal and state DNC /

suppression rules.

- Consumers and called parties may request no-further-contact through published channels: contact@broadcastmv.com, compliance@broadcastmv.com, and 888-395-7876. Such requests are recorded and applied to BCMV-controlled calling.
 - For messaging programs (when offered): documented sender-specific opt-in; STOP to cancel; HELP for help; one-time opt-out confirmation; re-enrollment only after a new affirmative opt-in. Submitting a general website inquiry does not create SMS consent.
 - BCMV does not currently name a third-party DNC-scrub vendor in this plan. If a vendor is later used, this plan and the RMD filing will be updated within 10 business days to identify it.
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7. Analytics, monitoring, and complaint handling

Analytics / monitoring (no invented vendors). BCMV does **not** currently use a named third-party robocall analytics vendor. Traffic and abuse review is performed operationally by the Manager and designated operations personnel using information reasonably available to BCMV, including:

- customer identity and approved use case;
- calling and called numbers, date/time, and available call-detail or platform logs;
- sudden volume changes, unusually high short-duration or unanswered-call rates, repeated calls to the same destinations, invalid or unassigned calling numbers, and inconsistent patterns versus the approved profile;
- complaint concentrations;
- carrier or downstream-provider warnings; and
- traceback or law-enforcement notices.

Traffic or a campaign presenting elevated risk is subject to investigation, additional documentation requirements, throttling, temporary blocking, number or route restrictions, or suspension. The review seeks to identify the responsible customer, campaign, calling platform, number, traffic path, and whether the stated lawful basis is supported.

If BCMV later engages a third-party analytics vendor, BCMV will name that vendor in an updated plan and RMD filing within 10 business days and will not imply vendor coverage that does not exist.

Complaint handling. Complaints received at contact@broadcastmv.com, compliance@broadcastmv.com, or 888-395-7876 (or referred by a carrier, the FCC, or a state agency) are logged, tied to the relevant customer/campaign/number where identifiable, investigated, and answered. Credible complaints can result in immediate traffic restriction pending investigation. False-positive or good-faith customer appeals are reviewed by the Manager before permanent termination, except where illegal traffic is evident or a traceback/authority directive requires faster action.

BCMV preserves relevant records and uses outcomes to adjust onboarding, monitoring, and access.

8. STIR/SHAKEN status — pending implementation (not complete)

Certification selection for the RMD portal: BCMV has **not implemented** the STIR/SHAKEN authentication framework on **any** portion of its network.

Truthful current facts:

- BCMV's STIR/SHAKEN work is **pending implementation**.
- BCMV does not hold a BCMV-specific OCN, STI-PA enrollment, SPC token, or STI-CA certificate.
- BCMV has not deployed a BCMV signing platform (STI-AS/VS) and does not sign calls in BCMV's own name.
- BCMV will not certify complete or partial implementation merely because an application is in progress, because another entity has implemented STIR/SHAKEN, or because a vendor account exists.

Intended path (not a claim of completion): FCC business FRN → USAC Form 499-A → this RMD filing → NECA Company Code/OCN **when** interconnection and customer proof exist → STI-PA enrollment → SPC token → approved STI-CA certificate → deploy signing for applicable IP-originated calls at the highest attestation supported by verified caller identity and numbering authority.

Until that path is complete for **this** legal entity, all traffic remains subject to the KYC, use-case, DNC, monitoring, complaint, and traceback controls in this program.

When BCMV can truthfully certify a change in implementation status, it will update the RMD within 10 business days.

BCMV does not, in this filing, claim a Commission implementation **extension** under 47 CFR § 64.6304. Non-implementation at this stage reflects that required identifiers and signing credentials have not yet been obtained for this entity.

9. Upstream and downstream provider controls

Before BCMV accepts voice traffic from, or sends voice traffic to, another provider in a BCMV-controlled arrangement, BCMV will:

- confirm the counterparty's legal identity and, where applicable, presence in the FCC Robocall Mitigation Database;
- decline to accept traffic directly from a provider that is not in the RMD or that has been removed by Commission action, consistent with applicable FCC rules;
- include contractual robocall-mitigation, traceback-cooperation, and suspension rights in interconnection or wholesale arrangements; and
- escalate, restrict, or terminate a provider relationship if illegal traffic, failed traceback cooperation, or RMD delinquency is indicated.

Operations note **Twilio** as the upstream SIP/voice platform. No Account SID is named here. Downstream or hosted-signing vendors are **not** named. Naming another entity's vendors (including Skybridge's) would be inaccurate. Supporting interconnect and platform evidence is maintained operationally and is **not** attached to this RMD PDF. Naming Twilio here is **not** a claim of live traffic.

10. Traceback and law-enforcement cooperation

BCMV commits to **respond fully within 24 hours** to traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium (Industry Traceback Group), and to

cooperate with those entities in investigating and stopping any illegal robocallers that use BCMV's service.

Operational practice:

- Designated traceback channel: **compliance@broadcastmv.com** and 888-395-7876, monitored as a business-priority mailbox/line. Public contact remains **contact@broadcastmv.com**. An ITG portal login will be added to this plan when created.
- Escalation owner: Romniel Dela Peña, Manager.
- On receiving a traceback or urgent abuse notice, BCMV identifies the account, campaign, calling platform, number, traffic path, and responsible user to the extent reasonably available; preserves evidence; and responds within 24 hours with complete and accurate information.
- When a notice identifies credible evidence that consent or another lawful basis is invalid, BCMV does not rely solely on a customer or lead-vendor representation. Implicated traffic is restricted or suspended while facts are reviewed.
- Corrective action may include removing records, adding suppression, changing number controls, requiring replacement evidence, ending a data source or vendor, terminating an account, and notifying affected carriers or authorities when appropriate.

BCMV will not originate, carry, or continue processing traffic that it knows is illegal robocall traffic.

11. Records, training, and continuous improvement

- Records sufficient to investigate a call are retained, including account identity, campaign, calling and called numbers, date and time, route or upstream/downstream provider where known, disposition, consent or other lawful-basis evidence, and relevant configuration or user information.
 - Retention is for a period appropriate to regulatory, contractual, and investigative needs. Traceback-relevant call detail is retained long enough to meet the 24-hour response commitment and subsequent investigation.
 - Personnel with customer-onboarding or traffic-operations access are instructed on this program, prohibited use cases, and the duty to escalate complaints and traceback immediately.
 - Violations or material risk may result in warnings, added controls, traffic limits, suspension, blocking, termination, referral to an upstream provider, or reporting to appropriate authorities.
 - BCMV uses complaints, traceback results, carrier notices, and monitoring outcomes to strengthen the program.
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12. Regulatory history and related entities

- Individual principal named for certifications: **Romniel Dela Peña, Manager.**
- Affiliates, parents, subsidiaries, and common control: **No.** Different people control Calldrive and other entities. Do **not** list Skybridge, Broadcast Avenue, Calldrive, or others as BCMV affiliates, parents, or commonly controlled entities.
- Telecom DBA: **none.**
- Prior two years (FCC / law-enforcement / agency action or investigation for illegal robocalling, spoofing, or RMD-certification deficiency, for BCMV and commonly owned/managed entities): **No.** BCMV has had **no FCC traceback and no FCC violations ever.**

If facts change before filing, the officer must revise this section. Do not add other entities by operational resemblance.

13. Program statement

BCMV applies this program to all calls it originates or transmits. The program is designed to provide affirmative, effective, and continually improving measures to prevent BCMV services from being used for illegal robocalls.

This document describes BROADCAST MEDIA VENTURES LLC's program for its FCC Robocall Mitigation Database filing.
