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ROBOCALL MITIGATION PLAN (RMP)

ROUND TRIP LLC d/b/a TelNext.net • FCC Form 477 / RMD Certification

Legal Entity:	ROUND TRIP LLC	Trade Name (DBA):	TelNext.net
Federal EIN:	42-4706480	Principal Address:	501 Union St Ste 545 #229878, Nashville, TN 37219
Corporate Email:	info@roundtripllc.online	Compliance Officer:	John James Addington
Contact Phone:	+1 (865) 239-8785	Platform URL:	https://dialer.telnext.net

1. Provider Classification & Operating Model

ROUND TRIP LLC operates as a **Voice Service Provider (VSP)** and **Intermediate Provider**. The company delivers cloud Session Initiation Protocol (SIP) switching, telephony management, and hosted voice services to commercial enterprise clients through its proprietary communications infrastructure (TelNext.net).

2. STIR/SHAKEN Implementation & Upstream Signing

- **Interconnection Architecture:** ROUND TRIP LLC originates and terminates outbound voice traffic exclusively through Tier-1, FCC-registered telecommunications carriers, specifically **Twilio Inc.** and **SignalWire Inc.**
- **Cryptographic Signing:** All public switched telephone network (PSTN) call egress is signed and authenticated by licensed upstream carrier partners utilizing the STIR/SHAKEN framework (RFC 8224, RFC 8588, and ATIS-1000074 standards).
- **Caller ID Integrity:** ROUND TRIP LLC ensures that caller identification numbers associated with outbound traffic are legitimate, verified numbers assigned to or leased by the originating subscriber.

3. Know Your Customer (KYC) & Customer Onboarding

Prior to provisioning outbound calling capability, ROUND TRIP LLC enforces a mandatory, multi-tier KYC verification procedure:

- **Entity & Identity Verification:** Verification of government-issued corporate documentation, Employer Identification Numbers (EIN/TIN), authorized officer identification, and physical commercial addresses.

- **Caller ID Ownership Validation:** Customers are strictly prohibited from transmitting unassigned, spoofed, or misleading caller identification. Number ownership is verified against carrier registries or multi-factor cryptographic challenges before enablement.
- **Terms of Service & AUP:** Mandatory contractual terms strictly prohibit unlawful telemarketing, pre-recorded voice robocalls without prior express consent, and violations of the Telephone Consumer Protection Act (TCPA) or the Truth in Caller ID Act.

4. Active Traffic Monitoring & Fraud Mitigation

- **Continuous Heuristic Analysis:** Platform monitoring tracks real-time traffic statistics including Average Call Duration (ACD), Short Duration Call Ratios (<6 seconds), and Answer-Seizure Ratios (ASR).
- **Automated Abuse Throttling:** Uncharacteristic bursts of sequential or automated high-frequency calling automatically trigger rate-limiting and administrative review.
- **Do-Not-Originate (DNO) Filtering:** Inbound and outbound filters block calls presenting invalid NANP formats, unassigned area codes, emergency numbers (911/988), or entries listed on FCC DNO lists.

5. Traceback Cooperation Commitment (ITG & Regulatory)

- **24-Hour SLA:** ROUND TRIP LLC commits to investigating and responding to all traceback inquiries from the **Industry Traceback Group (ITG)**, the **FCC**, state Attorneys General, and law enforcement agencies within **twenty-four (24) hours** of transmission.
- **Traceback Point of Contact:** Dedicated compliance email info@roundtripllc.online and phone +1 (865) 239-8785.
- **Corrective Action:** In the event that fraudulent or illegal robocall traffic is traced to a client, ROUND TRIP LLC immediately suspends network access, preserves session records, and cooperates fully with regulatory authorities.

6. Officer Certification

I hereby certify under penalty of perjury that I am an authorized officer of ROUND TRIP LLC, that I have reviewed the foregoing Robocall Mitigation Plan, and that the information contained herein is true, accurate, and represents the affirmative practices implemented across ROUND TRIP LLC networks.

Authorized Signature: /s/ John James Addington

Printed Name: John James Addington

Title: Managing Member / Authorized Officer, ROUND TRIP LLC

Date: September 18, 2026