

ROBOCALL MITIGATION PLAN

Prepared in Compliance with 47 C.F.R. Section 64.6305

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1. Purpose and Overview

This Robocall Mitigation Plan ("Plan") outlines the specific, reasonable, and effective steps taken by the Company to prevent the origination and transmission of illegal, fraudulent, or deceptive robocalls. This Plan is established and maintained to fulfill the regulatory obligations mandated by the Federal Communications Commission (FCC) under 47 C.F.R. Section 64.6305.

2. Know Your Customer (KYC) and Onboarding Procedures

The Company enforces strict customer vetting and onboarding processes to block illegal robocallers at the source. Prior to provisioning any voice services, the Company performs the following verification measures:

- **Identity and Business Verification:** Review of official business registration documents, corporate filings, and tax identification numbers (EIN).
- **Traffic Profile Assessment:** Prospective customers must disclose their expected traffic volumes, call types (e.g., conversational, telemarketing, alerts), and peak call attempts per second (CAPS).
- **Telephone Number Verification:** Proof of valid authorization and right-to-use for any telephone numbers assigned or used by the customer.

3. Traffic Monitoring and Call Analytics

The Company utilizes advanced monitoring tools to analyze real-time outbound traffic patterns for anomalies indicative of illegal or unauthorized robocalling. Key components of our monitoring system include:

- **High-Volume and Short-Duration (HVSD) Detection:** Automated triggers detect abnormal bursts of short-duration calls or high call failure rates.
- **Spoofing Prevention:** Systematic block of invalid, unallocated, or premium-rate numbers used as Caller IDs.
- **Dynamic Threshold Adjustments:** Continuous updating of alerting mechanisms to combat evolving spoofing and robocall vectors.

4. Traceback Cooperation

The Company is fully committed to tracking down the origins of illegal traffic. In accordance with FCC regulations, the Company:

- Cooperates fully and promptly with all traceback requests from the Industry Traceback Consortium (ITC), the FCC, and law enforcement agencies.
- Commits to investigating and responding to formal traceback inquiries within **24 hours** of receipt.

5. Enforcement and Penalty Mechanisms

Our terms of service strictly prohibit the use of our network for transmitting illegal robocalls. If a customer is found to be in violation or fails to respond to a traceback request, the Company immediately enforces:

- Immediate suspension of affected trunks or outbound capabilities.
- Permanent termination of service agreements for repeat or egregious violations.

6. Certification and Compliance Maintenance

The Company will review and update this Plan at least annually to maintain regulatory alignment and address new operational realities. The Company certifies under penalty of perjury that the information contained within this document and submitted to the FCC Robocall Mitigation Database is true, accurate, and complete.

Authorized Signature: Christine Gordon

Printed Name: Christine Gordon

Title: CEO