BEM COMM LLC - Robocall Mitigation Program Description

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1. Who we are. BEM COMM LLC (Katy, Texas) sells hosted business phone service to small businesses (about 5-25 staff: clinics, retail stores, offices): desk phones, a phone app, call routing, voicemail and an AI receptionist that answers inbound calls. We do not sell dialing platforms, bulk outbound calling, call-center dialers or wholesale transit, and we do not accept calls from other providers for onward delivery.

2. Know your customer (before any number is turned on).

- Every customer is a business. We record its legal name, address, a named responsible person and a phone and email, and check the business exists (state business record or EIN letter, plus a website or listing that matches).

- We sign a service agreement that forbids illegal robocalls, spoofed caller ID, unlawful telemarketing and autodialed or prerecorded calls without the consent the law requires.

- We do not activate service for anonymous customers, for customers paying only with prepaid or anonymous means, or for businesses whose stated use is high-volume outbound calling.

3. Caller ID control. Customers can only show caller ID numbers that are on their own account (numbers we assigned to them or ported in for them with the owner's signed authorization). The phone system does not let a customer type an arbitrary caller ID.

4. Watching traffic (call analytics). We run our own call analytics on every account, in two layers:

- *Robocall guard, every 5 minutes.* It scores each account's outbound calls from the last hour on the patterns an automated dialer leaves: most calls unanswered or hung up within seconds, almost every call to a different number, numbers dialed in sequence, more calls a minute or more calls at once per line than a person can make. Above a set score, outbound calling from that account is **put on hold automatically**; 911 always still works. Only a BEM person can lift the hold, after reviewing the account and contacting the customer.

- *Daily review.* Every account's calls are counted each day and flagged on: a high share of outbound calls, many very short or unanswered calls, many calls per extension per hour, many first-time destination numbers, or a sudden spike against the account's own history.

A new account has lower limits (calls per extension per hour and a daily spend cap) for its first 30 days. International calling is off by default, and every account has a spending cap. A flagged account is reviewed the same business day. Flags and holds are logged with who decided them and why.

5. Blocking. We block calls that use invalid, unallocated or unassigned numbers, or numbers on the industry do-not-originate list, as caller ID. When the FCC notifies us of illegal traffic, we act on it as the rules require.

6. Tracebacks. We answer every traceback request from the FCC, law enforcement or the industry traceback consortium fully and within 24 hours, using our call records (date, time, calling and called numbers, account). Traceback contact: the person named in our RMD filing.

7. Upstream providers (know your upstream). We buy service only from carriers listed in the Robocall Mitigation Database. We check each one's listing before signing up and again each year, and we stop sending traffic through any carrier that is removed from the database.

8. Upkeep. We review this plan at least once a year, recertify it every March 1, and update our filing within 10 business days of any change.

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