

LTD Broadband LLC

Robocall Mitigation Program

Filed Pursuant to 47 C.F.R. § 64.6305

1. Overview

LTD Broadband LLC ("LTD Broadband" or "the Company") is a voice service provider that utilizes wholesale termination providers to deliver voice traffic. This Robocall Mitigation Program describes the reasonable steps LTD Broadband takes to avoid originating, transmitting, or terminating illegal robocall traffic on its network, in compliance with the requirements of 47 C.F.R. § 64.6305 and the FCC's TRACED Act implementation rules.

2. Network Architecture and Call Authentication

LTD Broadband routes outbound voice traffic through wholesale termination providers that perform call verification and authentication procedures on inbound calls prior to presenting them for termination. These upstream providers apply industry-standard call validation measures to help ensure that traffic transiting LTD Broadband's network is legitimate and properly identified before reaching end users.

3. Robocall Mitigation Practices

LTD Broadband has implemented the following robocall mitigation practices to identify and prevent illegal robocall traffic:

a. Outbound Call Monitoring and Analytics. The Company performs ongoing monitoring and analysis of outbound call volumes, call duration patterns, and call completion rates to detect anomalous traffic that may indicate illegal robocalling activity. Unusual spikes in call volume, abnormally short call durations, or other irregular patterns are flagged for further review and investigation.

b. Cooperation with Industry Traceback Efforts. LTD Broadband is committed to responding to traceback requests from the Industry Traceback Group (ITG) and will provide timely assistance in tracing the origin of suspected illegal robocall traffic that may traverse the Company's network. The Company maintains designated points of contact to facilitate prompt responses to traceback inquiries.

c. Investigation and Enforcement. Upon identification of suspected illegal robocall activity originating from or transiting the Company's network, LTD Broadband will investigate the source of such traffic and take appropriate action, which may include blocking the traffic, terminating the responsible customer's service, or referring the matter to law enforcement or the FCC's Enforcement Bureau as warranted.

d. Cooperation with Regulatory Authorities. LTD Broadband will cooperate fully with the FCC, law enforcement agencies, and other regulatory bodies in investigating and stopping illegal robocallers that may be using the Company's services to originate or transmit calls.

4. Ongoing Compliance

LTD Broadband is committed to maintaining the effectiveness of its robocall mitigation program and will review and update these practices as necessary to address evolving robocall threats, changes in technology, and updates to FCC rules and industry best practices. The Company will update its Robocall Mitigation Database filing within 10 business days of any material changes to the information contained therein, in accordance with 47 C.F.R. § 64.6305.

5. Contact Information

Questions regarding this Robocall Mitigation Program or related compliance matters should be directed to the contact information on file in LTD Broadband's Robocall Mitigation Database certification.