



Date: February 2nd, 2026

Ref: FCC – Robocall Mitigation Plan Public Notice: DA 24-73 - Released: January 25, 2024 - WC
Docket No. 17-97 (“FCC order”)

EXHIBIT TO CERTIFICATION OF LIMITLESS MOBILE LLC. FOR ROBOCALL MITIGATION DATABASE

As part of Limitless Mobile LLC.’s (“LM”) – a CMRS (Commercial Mobile Radio Service) provider - submission to the Robocall Mitigation Database, pursuant to the FCC order for all providers of voice traffic to file certification for efforts to mitigate Robocall. LM has taken the following specific reasonable steps to meet general requirements under the FCC order:

- *LM has implemented STIR/SHAKEN Robocall mitigation solution provided by Inteliquent a.k.a. Sinch, using token standards for authentication, for tagging the calls with appropriate attestation levels for each originating call required.*
- *Company policies and practices have been created for understanding LM’s customers as well as their upstream provider’s voice traffic, by providing questionnaires to be filled out to make certain that all legal requirements including Robocall Mitigation are met.*
- *All of LM’s end-users, prior to LM providing voice services, agree that they will need to comply that their numbers will not originate any illegal robocalls.*
- *An exchange of escalation contacts has also been implemented between LM’s upstream providers (Inteliquent a.k.a. Sinch) for supporting any traceback requests and for quick mitigation where upstream providers would need to get involved.*
- *LM also operates a 24x7x365 NOC team that uses network equipment, alarming tools, statistics reports for alerting for any investigation needed for any illegal robocalls being made on LM’s network and helping to respond within 24 hours for any traceback requests.*

FCC’s “Know your Customer...”

- *Before LM provides voice services to any new customers, they are given an agreement that they would have to sign to confirm that they will not be involved in any illegal robocalls or spoofing with their assigned number/s.*
 - *If potential new clients have their own end-user customers, then those end-user customers will also need to fill out the questionnaire and agree to the policies described above.*
 - *If a potential new client or customer fails to agree to or complete a questionnaire, LM will not be able to provide voice services to customer.*
 - *The customer agreement specifies that if a traceback request is issued to LM, due to illegal robocalls or spoofing, from the Industry Traceback Group (ITG), FCC, law enforcement, or if LM discovers that the number/s provided to customer are being used to originate illegal robocalls, LM will immediately shut off services to the customer until investigation is fully satisfied.*
 - *This agreement would need to be signed, dated by the new customer, and filed with LM, before the new voice services are provided.*
 - *For existing voice customers, LM has reached out to them with an explanation on the new policies put in place for combatting illegal robocalls, strictly enforced by LM.*
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Contract Termination: LM typically has contractual rights that allow it to terminate customers that violate relevant law, including violations of the Telephone Consumer Protection Act. When appropriate, LM enforces these rights. Subject to applicable laws that may prevent it from doing so, LM may also terminate accounts if it discovers that any of the entities or individuals associated with a customer account have been named by the FCC or the FTC as an illegal robocaller or have failed to respond to traceback requests.

LM has the following excerpt in our contract to every retail customer:

General Policy. Limitless Mobile reserves the sole discretion to deny or restrict your service, or immediately to suspend or terminate your service, if the use of the service by you or anyone using it, in our sole discretion, violates the Customer Service Agreement or other Limitless Mobile policies, is objectionable or unlawful including violation of Robocalls.....LM reserves the sole discretion to deny or restrict your service, or immediately to suspend or terminate your service.

In addition, LM has the following excerpt from our contract with every IoT customer:

1. Regulatory Compliance This Agreement shall be subject to all necessary approvals of local, state and federal regulatory agencies having jurisdiction over the provision of Services. If any provision of this Agreement does not comply with any law, ordinance or regulation of any regulatory authority, such provision shall to the extent possible be interpreted in such a manner as to comply with such law, ordinance or regulation, or if such interpretation is not possible, it shall be deemed amended to satisfy the minimum requirements thereof.
2.Compliance with Laws
 - (a) Each Party represents and warrants that their performance under this Agreement will be in compliance with all applicable material federal, state, county and local laws, rules, regulations and orders that apply to it, its operations and facilities. For the avoidance of doubt this includes the use of Company's Products and Services under this Agreement.
 - (b) Customer is responsible for ensuring that it has all the necessary registrations and licenses required for it to enter into this Agreement and for ensuring it has the necessary procedures and audit capability to ensure it complies with the terms of all applicable registrations and licenses. Company shall not be responsible for any regulatory non-compliance by Customer during the operation of this Agreement. Customer shall co-operate fully with Company and shall provide all information reasonably requested by Company in connection with enquiries from law enforcement agencies.
 - (c) Customer shall co-operate fully with Company and shall provide all information reasonably requested by Company in connection with enquiries from law enforcement agencies.

FCC's "...describe any call analytics systems they use to identify and block illegal traffic ..."

Network Systems: LM uses various network tools to help identify and block any potential illegal robocalls originating from the network.

- *Telsasoft: Northbound interface software application, provided by Telsasoft Inc., used for collecting various statistics and threshold alarming from LM's core network elements, including average call durations, Answer Seize Ratio (ASR), and call counts that are analyzed daily by our NOC team, which would alert team to mitigate all impact of illegal or unwanted robocalls on customers.*
- *Wireshark: This common troubleshooting tool can be used for capturing call data to help in any traceback investigation.*

- *CDRs (Call Detail Records): If an investigation of a potential illegal robocall is present, looking at CDRs helps in determining who is originating the call in order to immediately shut this traffic down in LM's network.*
- *MSC/HLR: If a customer number is identified making illegal robocalls originating from LM network, number can be looked up in the system and immediately have voice services shut off.*