



HADLO Technologies, LLC

Robocall Mitigation Plan

Updated – May 12, 2026



The following is HADLO Technologies, LLC ("HADLO") submission to the Robocall Mitigation Database, pursuant to the FCC's directives outlined in the Report and Order(s) DA 24-73 (<https://docs.fcc.gov/public/attachments/DA-24-73A1.pdf>) (RMD Public Notice)

Indicated below are the robocall mitigation measures employed by HADLO switching platform. HADLO implements the features on their network and traffic. HADLO certifies that its switching platform follows required traceback standards. HADLO will continue to implement new robocall mitigation measures as they become available.

24 Hour Response

HADLO certifies that it will respond to all Traceback Requests from the Industry Traceback group (ITG) within 24 hours and civil and criminal law enforcement agencies, cooperating fully in efforts to investigate and eliminate illegal robocalls, while following CPNI requirements.

Full STIR/SHAKEN implementation

HADLO has Fully implemented STIR/SHAKEN attestation. HADLO is a USA IPES carrier, with the address of 4935 Main St., STE 7-304 Spring Hill, TN 37174-2735. All compliance or questions with the RMD and/or STIR/SHAKEN should be reported to compliance@hadlotechnologies.com.

HADLO RMD Verification

HADLO policies require refusing traffic from any provider not registered in the Robocall MitigationDatabase (RMD).

HADLO KYC Verification

HADLO performs Customer Due Diligence and KYC, Mandating that all potential customers complete a Know Your Customer (KYC) form and undergo a due diligence process.

Our KYC collects information such as the following, and continues to add details over time. We also require our customers to show the procedure they use to KYC and vet any customers they have.

1. Customer Name:
2. Other Designated Names (DBA):
3. Physical Address:
4. Physical City/State/Zip:
5. How many Officers are physically located with USA and work at the listed Physical Address?
6. Physical Address of Switching equipment
7. Phone and Contact at Physical Equipment Location
8. Mailing Address (if different):
9. Mailing City/State/Zip (if different):
10. Customer Main Phone:
11. Customer Fax:
12. Customer URL:
13. Entity Type:
14. State of Incorporation:



15. Date of Incorporation:
16. FEIN #:
17. FRN #:
18. Date FRN Filed:
19. FCC-214 #:
20. FUSF (499)#:
21. Company Web URL:
22. Company Web URL of Acceptable Use Policy:
23. Affiliated with any NON US Entity (Greater than 10%)?
24. For Foreign Customers - Country Licensed in:
25. Foreign Registration Number:
26. Company Contact Information
 - Name
 - Phone
27. Primary Main Email:
28. Billing / Accounting Email:
29. Support / NOC Email:
30. Legal Email:
31. Compliance Email:
32. Fraud Report Email:
33. Rates Email:
34. Please list a Provider who can provide a reference (1)
35. Please list a Provider who can provide a reference (2)
36. Business Description:
37. Company Name registered in the "Intermediate Provider Registry" and Registration Number.
38. OCN associated with Stir/Shaken Header:
39. Additional OCNs associated with Customer:
40. List your RoboCall Mitigation Database Number here.
41. Is the company business based in U.S.?
42. Robo call Mitigation Database requirements (including Feb 2025) ? This means you have properly recertified.
 - Please provide a copy of your Robo Mitigation Plan to compliance@hadlotechnologies.com
 - PROVIDE - URL link to Recertified RMD
43. Is customer currently only passing calls with Stir/Shaken?
44. Customer is NOT signing for users, required to sign as of Sept 18, 2025? - Be certain you are not signing 3rd party calls
45. Is Customer listed in Intermediate Database? https://fccprod.servicenowservices.com/ipr_ext
46. Does Customer fully Support 603+ as of 3/25/2026?
47. Does customer originate or process conversational traffic?
48. Does customer originate or process autodialed call traffic?
49. Does customer have any direct autodial clients?
50. Are any sources of traffic from non-U.S. clients (Gateway)?
51. Is customer actively engaged in ITG tracing process?
52. How many total ITG reports - regardless of type
53. Has customer been the originator or U.S. point of entry for more than 3 tracebacks or notifications, within the last year?
54. Has customer been the originator or U.S. point of entry for more than 3 tracebacks or notifications for calls verified to be falsely purporting to be from any government agency (SSA, IRS, etc.)?
55. Has Customer had even 1 Fraud ITG ticket in the last year (If YES - How many.
56. Has customer been determined to be a "Non-Cooperative Voice Service Provider" ?
57. Has customer been blocked or removed from any service providers network in the last two years?
58. Has the company, its predecessor(s), its parent/affiliate(s), or its principal(s)/controlling person(s) ever been subject to an adverse judgment arising out of a civil lawsuit relating to the use of telecommunications networks or been the subject of any law enforcement action or investigation by any local, state, or federal agency?



- 59. Are you a Gateway Provider (a provider that is the entry point for foreign calls into the United States)
- 60. Has any of Service Provider Customer's performed dialing, origination, of unlawful robocalls in last 2 years?
- 61. Confirm you will be using required DNO list:
- 62. Do you have an Acceptable Use Policy (AUP)?
- 63. Please provide a copy of your procedure to VET and KYC your customers:

HADLO DNO Compliance

HADLO is utilizing Do Not Originate ("DNO") lists, primarily leveraging the SOMOS and ITG list, as well as adding additional numbers reported outside the SOMOS, ITG list manually.

HADLO Mitigation Certification

HADLO certifies that all calls originating on our network are subjected to a robocall mitigation program that meets the specified requirements. We affirm that our prior certifications remain unrevoked by Commission action and that we are not barred from participation in the Robocall Mitigation Database, nor has HADLO been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description. HADLO has fully implemented STIR/SHAKEN across our network.

Analytics

Hadlo relies in part on third-party analytics. Hadlo relies up on ITG Communications and SOMOS. for Do Not Originate lists. Hadlo relies upon 46Labs for SPAM filter services to block or label calls as SPAM. We have also recently updated to meet the Federal Communications Commission's Eighth Report and Order (FCC 25-15) adopted SIP 603+ requirements to fulfill the TRACED Act's mandate for "transparency and effective redress" for callers whose calls are blocked based on reasonable analytics, again this relies upon 46Labs implementation.

The following plan shall outline specific "commercially reasonable efforts/steps" HADLO has undertaken to prevent origination and transmission illegal robocall traffic.

HADLO operates in multiple capacities: As a direct service provider, an intermediate provider, and a U.S.-based gateway provider. HADLO may have direct retail customers in addition to our wholesale operations.

Third-Party Token Signing

Hadlo does sign/attest certain calls for customers, not engaged in resale operations. We do not sign or attest for any companies we determine involved in gateway, wholesale, resale, using the US calling numbers calling US toll destinations. We will Attest "C" for Non USA calling numbers, to US toll destinations, showing we are the gateway into USA, only for customers who are truly KYC compliant, Enterprise customers.

Regulatory Compliance

HADLO is not currently, nor has it ever been, subject to any Commission, law enforcement, or regulatory



agency action or investigation related to suspected unlawful robocalling or spoofing activities.

Operating Company Numbers (OCN) (CCNA)

Operating Company Number: 436J

CCNA: HDN

AOCN G176

FCC-214: ITC-214-20230925-00116 E

Traceback CPNI

For handling sensitive customer information (CPNI), HADLO adheres to strict protocols, ensuring that such information is exclusively shared through the official ITG portal. It is important to note that CPNI is only disclosed within the secure transmission such as ITG portal.

To facilitate the traceback process, the official channels through which Traceback Requests can be initiated:

Email: Requests can be directed to compliance@hadlotechnologies.com. Upon receipt, HADLO personnel will verify the request before proceeding.

Direct Contact: Thomas Hadden (CEO), is the designated contact in the Robocall Mitigation Database, reachable at (615) 814-0102 or via email at thh@hadlotechnologies.com.

NOC: Available around the clock, our support center can be reached at noc@hadlotechnologies.com. Upon receipt a ticket is assigned, and tracked to completion.

Methods and Efforts Employed to Avoid Carrying or Processing Illegal Robocalls

- Do Not Originate "DNO" queries (SOMOS & ITG Database) are utilized to confirm compliance with proper DNO requirements.
- Know Your Customer "KYC" measures have been implemented, and are reviewed yearly for customers, to ensure compliance.
- ANIs and DNISs are tracked and documented from customer through vendor delivery, including all voice "hops" and stored for 90-days.
- Originating and termination numbers are profiled by traffic analytics engine for irregular behavior including, but not limited to:
 - High Volume / Short Duration Traffic
 - Calls to Unallocated Numbers
 - Calls with excessive cancels
 - Calls from numbers that exist on a known robodialer list.
 - CPS to Call channel ratio to avoid high CPS automated dialers
- Automated filtering for both inbound and outbound traffic to our voice network.
- HADLO commits to respond within the 24 hour requirement to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.



- HADLO will continue to monitor the FCC publicly released listings of VSPs who have triggered requests, and promptly block any traffic when notified by the FCC and/or respond to commission as to the source of the traffic.
- HADLO shall take action when notified by the FCC of potentially illegal calls utilizing its network and will promptly inform the Commission that it is not the originating or gateway provider for the identified traffic, specify which upstream VSP with direct access to the U.S. public switched telephone network it received the traffic from, and, if possible, take lawful steps to mitigate this traffic.
- HADLO will block any VSP immediately downstream when notified by the FCC that the VSP has failed to satisfy its obligations under these rules..
- We conduct a review of our measures in an effort to combat new techniques that scammers use to compromise the PSTN in the US.
- HADLO maintains an Acceptable Use Policy (AUP) that subscribers may sign before being permitted to use HADLO's network. HADLO's contractual terms with subscribers specify that HADLO may take action up to suspension or termination of service for violation of the AUP. Among other things, the AUP prohibits:
 - providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
 - violating any applicable law;
 - violating applicable industry accepted guidelines; and
 - using HADLO's service to engage in or in connection with fraudulent activities.
- HADLO works with its upstream carriers to detect a calling pattern consistent with illegal robocalls. If such a call is detected, HADLO will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.
- When traffic analysis indicates the presence of likely illegal robocalling, HADLO may follow certain procedures on investigating such subscribers.

The procedures established may include but are not limited to:

 - checking recent and past call detail records and benchmark against expected trends;
 - checking recent and past account activity and purchases;
 - investigating if any system issue generates the strange behavior;
 - verifying that the call originating path is valid; and
 - contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.
- New customers requesting an excessive number of calls per second "CPS" will be screened for legitimate call usage needs.
- New and existing customers with an excessive number of call paths may receive Robocall outreach
- HADLO utilizes KYC measures to eliminate illegal robocalling customers from terminating to HADLO's network.

10 Day Material Change.

Hadlo will comply with the required rule for any Material Changes promptly updated to RMD.

Recertify Yearly.



Hadlo shall also recertify it's RMD filing by March of each year.

Traceback Requests.

HADLO certifies that its software follows required traceback standards. HADLO commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, regulators, and the industry traceback consortium.

STIR/SHAKEN Implementation.

HADLO has implemented STIR/SHAKEN to all egress traffic. STIR (Secure Telephony Identity Revisited) and SHAKEN (Secure Handling of Asserted information using toKENS) is an industry framework that is being developed to prevent the completion of calls where the originating provider does not own or is not authorized to use the Caller ID associated with the call (a "spoofed call"). STIR/SHAKEN uses digital certificates, based on common public key cryptography techniques, to ensure the calling number of a telephone call is secure. The expectation is that the certificate technology will enable the called party to verify that the calling number is accurate and that it has not been illegally spoofed.

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