

Lightcurve Robocall Mitigation Program

Updated: February 2026

I. Introduction

Mashell Telecom, Inc., Rainier Connect North LLC and Evergreen Washington Connect LLC dba Lightcurve (the “Company(s)” or “Lightcurve”) is a “voice service provider,” as defined in Section 64.6300(n) of the rules of the Federal Communications Commission (“Commission”).

Pursuant to 47 C.F.R. §§ 64.6301–64.6308, the Pallone-Thune TRACED Act, and the Federal Communications Commission’s enhanced Robocall Mitigation Database (RMD) requirements effective February 5, 2026, Lightcurve maintains this Robocall Mitigation Program.

This Program describes the policies, procedures, and technical controls Lightcurve has implemented to prevent the origination, transmission, or facilitation of illegal robocalls and to comply with STIR/SHAKEN and enhanced RMD obligations.

II. Company Network and STIR/SHAKEN Implementation

Lightcurve operates as a facilities-based provider of voice and broadband services. Portions of the Company’s network rely on technology that cannot initiate, maintain, carry, process, or terminate SIP calls. Accordingly:

- Lightcurve qualifies for the non-IP extension pursuant to 47 C.F.R. § 64.6304(d) for applicable TDM portions of its network.
- Lightcurve implements STIR/SHAKEN authentication for IP-originated traffic where required.
- Lightcurve maintains active STI certificates issued by an authorized Certification Authority.
- Lightcurve applies A-, B-, or C-level attestations consistent with its relationship to the calling party.

Lightcurve blocks traffic from providers not listed in the FCC Robocall Mitigation Database where required under Commission rules.

III. Robocall Mitigation Measures

Lightcurve has implemented, and continues to observe, the following measure to mitigate and avoid illegal robocall traffic originating from its voice service network:

- The identity of all subscribers to Lightcurve’s originating voice services is vetted via the Company’s application process to ensure valid use of telephone number resources.
- Caller ID information is verified, and subscribers are not granted the right to transmit non-verified or spoofed caller ID information.
- Lightcurve does not sell originating services to international call originators.
- Lightcurve does not offer high-volume outbound calling platforms or mass marketing dialer services.
- All originating voice services require a physical or logical association with Lightcurve’s assigned telephone number resources.
- Customers may originate calls only from telephone numbers assigned by Lightcurve or properly authorized for use.
- Lightcurve monitors originating voice service traffic to ensure validity.

Monitoring includes:

- Automated call detail record (CDR) review;
- Excessive call volume detection;
- Repeated short-duration call detection;
- Abnormal call-per-second threshold detection;
- Detection of invalid or unassigned numbers;
- Screening against Do-Not-Originate (DNO) lists.

Lightcurve utilizes network monitoring systems and/or third-party analytics solutions to identify potentially unlawful calling patterns. Company personnel investigate any subscriber activity that appears suspicious or indicative of illegal robocalling. If illegal activity is identified, Lightcurve will take appropriate mitigation action, including call blocking, suspension, or termination of service.

IV. Know Your Customer (KYC)

Lightcurve maintains a “Know Your Customer” program applicable to retail voice customers and wholesale or switched access customers.

- Verification of legal name and service address.
- Verification of responsible contact information.
- Confirmation of right to use telephone numbers assigned.
- Enhanced review for higher-risk or higher-volume customers.

Lightcurve does not knowingly provide voice services to entities engaged in unlawful robocalling.

V. Know Your Upstream Provider (KYUP)

Lightcurve maintains a “Know Your Upstream Provider” program with respect to immediate upstream carriers.

To the extent feasible, Lightcurve confirms:

- Upstream carrier legal name and address;
- Active listing in the FCC Robocall Mitigation Database;
- STIR/SHAKEN compliance where applicable.

Lightcurve may refuse to exchange traffic with providers not compliant with Commission requirements.

VI. Contract and Tariff Protections

Lightcurve services are subject to applicable tariffs and/or contractual agreements which:

- Prohibit unlawful or abusive use of service;
- Require compliance with federal, state, and local laws;
- Permit a right to suspend or terminate service for illegal robocalling;
- Require cooperation with traceback investigations.

Lightcurve reserves the right to suspend or terminate service immediately if a customer uses its services to originate illegal robocalls.

VII. Enhanced Robocall Mitigation Database Compliance (Effective February 5, 2026)

Lightcurve complies with the FCC's enhanced RMD requirements.

Annual Recertification

Lightcurve will recertify its RMD filing annually by March 1 following internal review and officer-level confirmation of accuracy.

10-Business-Day Update Requirement

Lightcurve will update its RMD filing and FCC CORES registration within ten (10) business days of any material change in required information.

Multi-Factor Authentication

All FCC CORES and RMD access is protected by multi-factor authentication (MFA).

Internal Governance Controls

Lightcurve maintains:

- A regulatory compliance calendar;
- Designated RMD compliance personnel responsible for addressing robocall mitigation related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, as follows:

Name: Ben Miller

Title: Network Operation Manager

Address: 104 Washington Avenue North, Eatonville, WA 98328

Telephone Number: (360) 832-4026

Email: ben.miller@getlightcurve.com

- Annual documented compliance review;
- Retention of supporting documentation for mitigation activities.

VIII. Traceback Cooperation

In its capacity as a voice service provider, Lightcurve is committed to:

- Responding within 24 hours to lawful traceback requests from the FCC, law enforcement, and the Industry Traceback Group, and will cooperate in investigating and stopping illegal robocalls;
- Providing relevant call detail information consistent with CPNI rules;
- Cooperating in investigation of suspected illegal robocalls;
- Taking appropriate mitigation action when illegal activity is identified.

IX. Do Not Originate List

Lightcurve maintains and enforces a Do-Not-Originate list consistent with FCC requirements. Calls from invalid, unallocated, or unauthorized numbers are blocked.

X. Record Retention

Lightcurve retains:

- RMD filings and recertifications;
- Traceback correspondence and responses;
- Fraud investigations and mitigation actions;
- Traffic monitoring records;
- STIR/SHAKEN attestation documentation.

Records are retained for a minimum of five (5) years unless otherwise required.

XI. Continuous Review

Lightcurve reviews this Robocall Mitigation Program annually and updates it as necessary to reflect FCC rule changes, industry best practices, and operational changes.

Dated: February 2026

Mashell Telecom, Inc.
Evergreen Washington Connect LLC
Rainier Connect North LLC
dba Lightcurve



Authorized Officer

Title: Senior Vice President of Finance

Lightcurve Officers, Parent Companies, and Affiliates

Company Officers

President & CEO – Anand Vadapalli
Chief Operations Officer – Pao Lo
Senior Vice President of Finance – Danielle Clausen
Senior Vice President of Sales & Marketing – Beth Barnes

Parent Companies

Alphaboost Holdings LLC
Mashell, Inc.
NextCape LLC

Affiliates

Company Name	FRN	OCN
Mashell Telecom, Inc.	0005061544	2431; 7720
Rainier Connect North LLC	0029023033	
Evergreen Washington Connect LLC	0001581297	2412; 2453