

SLYTEK LLC

ROBOCALL MITIGATION PLAN

Filed with the FCC Robocall Mitigation Database

ENTITY COVERED

SlyTek LLC

1200 Trumbull Ave

Girard, Ohio 44420

Trumbull County, Ohio

Operating Company Number (OCN): 090M

FCC FRN: 0031042260

STIR/SHAKEN STATUS

SlyTek LLC has completed full implementation of the STIR/SHAKEN Caller ID Authentication Framework across its network.

SlyTek LLC is an authorized participant in good standing with the STI-PA (Secure Telephone Identity Policy Administrator).

SlyTek LLC has secured its STIR/SHAKEN certificate through an FCC-approved Certification Authority.

All calls originating on SlyTek LLC's network for which SlyTek LLC serves as the direct originating provider are signed by SlyTek LLC with full (A-level) attestation where technically supported, and partial or gateway attestation as appropriate in all other cases.

PURPOSE AND SCOPE

This Robocall Mitigation Plan ("RMP") describes the targeted and prudent measures that SlyTek LLC has implemented to prevent the transmission or handling of unauthorized robocall traffic. This plan is submitted pursuant to the FCC's rules requiring voice service providers to file with the Robocall Mitigation Database ("RMD").

This plan also sets forth SlyTek LLC's commitment to:

- Promptly and comprehensively respond to all traceback inquiries from the Federal Communications Commission ("FCC" or "Commission"), law enforcement agencies, and the Industry Traceback Group ("ITG") within 24 hours;

- Cooperate with the Commission, law enforcement, and the industry traceback consortium in identifying and halting any illicit robocall activities leveraging SlyTek LLC's services for call transmission or processing; and
- Continuously improve its robocall mitigation practices in response to evolving threats and regulatory guidance.

ROLES IN THE CALL CHAIN

SlyTek LLC is a managed IT and voice services provider serving business customers throughout Northeast Ohio and Western Pennsylvania. SlyTek LLC functions primarily as a Direct Originating Service Provider for its business customers, including healthcare organizations, small and medium-sized businesses, and other commercial enterprises.

In this capacity, SlyTek LLC originates calls on behalf of its subscribers and transmits those calls to downstream carriers for completion. SlyTek LLC does not serve as a gateway provider for international traffic and does not transit traffic for unvetted third-party carriers.

KNOW YOUR CUSTOMER (KYC)

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to the telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with SlyTek LLC through which SlyTek LLC transmits, originates, and/or terminates calls on behalf of that subscriber.

SlyTek LLC's KYC program requires collection and verification of specific subscriber information prior to activation of voice services. At minimum, the following information is collected and verified for all subscribers:

- Legal business name and DBA (if applicable)
- Physical business address (verified, not a P.O. Box)
- Primary contact person name and title
- Business phone number and email address
- Nature of the customer's business and anticipated call volume
- Authorized telephone numbers the subscriber intends to use as caller ID

For business and enterprise customers, SlyTek LLC also performs the following additional verification steps:

- Verification of business registration with the applicable Secretary of State or state agency
- Validation of physical address against third-party reference sources
- Review of business website and public online presence
- Search for any known FCC, FTC, or state attorney general complaints or enforcement actions

TELEPHONE NUMBER AUTHORIZATION

SlyTek LLC maintains a comprehensive inventory of all telephone numbers (TNs) allocated to its subscribers. A subscriber is authorized to use a TN as their outbound caller identity only under one of the following conditions:

- The TN is directly administered by SlyTek LLC and assigned to that subscriber; or
- The subscriber provides a valid Letter of Authorization (LOA) or other documentation establishing their legal right to use the specified TN as a caller identity.

SlyTek LLC will not authenticate or sign outbound calls presenting a caller ID that the subscriber is not authorized to use. Requests to use unverified or unauthorized TNs will be denied pending proper documentation and validation.

EFFORTS TO AVOID CARRYING OR PROCESSING ILLEGAL ROBOCALLS

SlyTek LLC is committed to the prevention of illegal robocalls originating on or transiting its network. SlyTek LLC employs the following measures:

Traffic Monitoring and Analytics

- Real-time monitoring of voice traffic for patterns consistent with illegal robocalling activity, including sudden spikes in call volume, unusually high Answer Seizure Ratios (ASR), abnormally short call durations, and high rates of calls to non-working numbers.
- Automated alerting to SlyTek LLC's network operations team when suspicious calling patterns are detected.
- Periodic review of subscriber call detail records (CDRs) to identify anomalous behavior.

Caller ID and Number Validation

- Validation of outbound caller ID against the subscriber's authorized TN inventory prior to call processing.
- Verification that calling party numbers are valid, allocated, and not present on Do-Not-Originate (DNO) lists.
- Blocking of calls presenting invalid, unallocated, or unauthorized TNs as caller ID.

STIR/SHAKEN Implementation

- SlyTek LLC signs all originating calls using the STIR/SHAKEN framework with appropriate attestation levels based on the verified relationship with the subscriber and the TN authorization status.
- Full (A) attestation is applied where SlyTek LLC both manages the subscriber relationship and controls the TN being used as caller ID.

- Partial (B) or gateway (C) attestation is applied as appropriate where full attestation criteria are not met.

Enforcement Actions

- SlyTek LLC reserves the right to immediately suspend or terminate a subscriber's voice services upon detection of calling patterns consistent with illegal robocalling or caller ID spoofing.
- SlyTek LLC will cease processing traffic from any entity identified by the Commission or the FTC as an illegal robocaller or subject to enforcement action.
- Contractual agreements with all subscribers include provisions allowing SlyTek LLC to terminate service for violations of applicable law, including the Telephone Consumer Protection Act (TCPA) and FCC rules.

TRACEBACK COOPERATION

SlyTek LLC is committed to full cooperation with traceback and trace-forward investigations. SlyTek LLC will respond fully and within 24 hours to all traceback requests from the Commission, law enforcement agencies, and the Industry Traceback Group (ITG).

SlyTek LLC maintains call detail records (CDRs) and related call signaling data necessary to support traceback investigations, in accordance with applicable legal retention requirements. Upon receipt of a valid traceback request, SlyTek LLC will promptly identify the subscriber associated with the relevant traffic and provide all information necessary to facilitate the investigation.

CUSTOMER EDUCATION

SlyTek LLC educates its subscribers on responsible use of voice services and the legal requirements governing outbound calling, including consent requirements under the TCPA and FCC rules. SlyTek LLC provides guidance to its customers on how to identify and report suspected robocall abuse and how to protect their telephone numbers from spoofing.

Subscribers are informed at the time of service enrollment of SlyTek LLC's acceptable use policies and the consequences of violating applicable laws and regulations governing automated or bulk telephone calling.

COMMITMENT TO COOPERATE

SlyTek LLC commits to cooperate promptly and fully with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use SlyTek LLC's services to carry or process calls. SlyTek LLC will also promptly respond to inquiries from the FTC and state attorneys general seeking traceback or similar information.

CERTIFICATIONS

- SlyTek LLC has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- SlyTek LLC is not currently subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

PLAN UPDATES

SlyTek LLC recognizes that robocall mitigation is an evolving challenge requiring continuous improvement. SlyTek LLC will monitor industry best practices, FCC guidance, and ITG recommendations, and will update this plan as necessary to maintain compliance and effectiveness.

In the event of any material change to this plan, SlyTek LLC will distribute the updated plan to all relevant employees, contractors, and consultants, and will file the update with the Robocall Mitigation Database within ten (10) days of such change.