

## **Full Service Network, LP**

### **Robocall Mitigation Plan – Revised 2026 Version 2.0 – Effective February 2026**

Full Service Network (FSN) is a supporting partner of the Industry Traceback Group (ITG) and an ITG Steering Committee Member.

FSN is committed to preventing the origination and transmission of illegal robocalls and maintaining full compliance with FCC regulations.

FSN does not have a history of enforcement actions for illegal robocalls, TCPA, TSR violations, etc.

### **Governance and Oversight**

FSN's President serves as the executive officer responsible for oversight of this Robocall Mitigation Plan. The President reviews this plan annually and upon any material network or regulatory change to ensure continued compliance with FCC robocall mitigation obligations.

Relevant staff receive periodic training regarding robocall mitigation obligations.

### **Traffic Monitoring and Analytics**

FSN does not allow unlimited SIP connections. Each customer has defined concurrent call paths.

FSN follows the ITG Do Not Originate (DNO) policy and maintains its own internal DNO list.

FSN utilizes automated systems to monitor all voice traffic originating on or transiting its network.

Objective monitoring thresholds include, but are not limited to:

- Sequential dialing exceeding defined volume thresholds within defined time intervals
- Short-duration calls (under 6 seconds) exceeding defined percentage thresholds
- Answer Seizure Ratio (ASR) below defined minimum thresholds
- STIR/SHAKEN verification failure rates exceeding acceptable levels
- Significant deviations from established customer traffic baselines

Automated alerts are reviewed by compliance personnel within 24 hours.

FSN reserves the right to immediately suspend or terminate service upon detection of illegal or suspicious robocall activity.

### **Role FSN Plays in the Call Chain**

FSN does not offer wholesale, resale, or intermediate voice services to other providers. FSN originates calls solely on behalf of its own end-user customers and terminates calls destined for its own end-user customers.

FSN does not function as a gateway provider and does not accept foreign-originated traffic for further routing to other U.S. networks.

Accordingly, FSN is not an intermediate provider as defined by FCC rules.

FSN will not accept traffic from an unregistered provider.

### **Customer Enforcement Policy**

- FSN prohibits the use of its network for illegal robocalls.
- FSN may immediately suspend or terminate service upon detection of illegal activity.
- Where immediate suspension is not imposed, the customer must cure violations within a period not to exceed 24 hours.

### **Know Your Customer**

FSN collects and verifies customer identity information, including beneficial ownership for commercial entities.

Customers are screened against FCC enforcement databases and traceback findings.

FSN validates customer authority to use asserted calling numbers prior to assigning Full Attestation.

An expected traffic profile is established prior to activation and significant deviations trigger compliance review.

### **Know Your Upstream Provider**

FSN verifies upstream provider certification in the FCC Robocall Mitigation Database and retains documentation of such verification.

Periodic re-verification is conducted.

FSN reserves the right to immediately block traffic from any upstream provider exhibiting suspicious or unlawful traffic patterns.

### **Traceback**

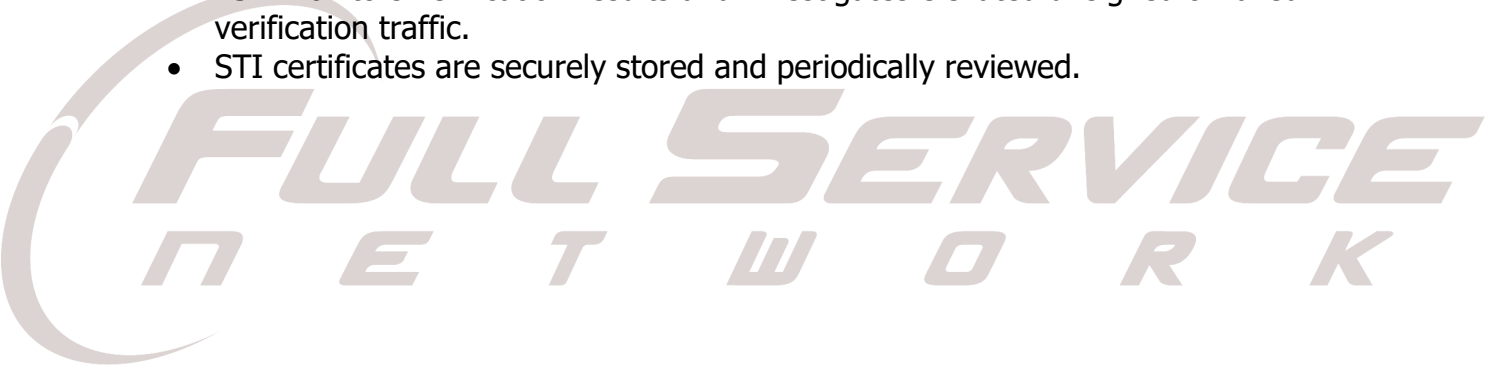
- FSN responds to all traceback requests within 24 hours.
- Call Detail Records (CDRs) are retained for a minimum of 24 months to support investigations.

## **STIR/SHAKEN**

FSN is registered with the STI-PA (OCN 7820) and utilizes a certificate issued by the TransNexus Certification Authority.

Attestation is assigned as follows:

- Full Attestation (A) when the customer is fully authenticated and authorized to use the calling number
- Partial Attestation (B) when the customer is known but number authorization cannot be fully verified
- Gateway Attestation (C) when required by regulation
- FSN monitors verification results and investigates elevated unsigned or failed verification traffic.
- STI certificates are securely stored and periodically reviewed.

A large, light gray watermark of the Full Service Network logo is centered on the page. It consists of the words "FULL SERVICE" in a bold, italicized sans-serif font, with "NETWORK" in a smaller, spaced-out sans-serif font below it. A large, light gray arc is positioned to the left of the text.