



FastTrack Communications, Inc., Robocall Mitigation Program

FastTrack Communications, Inc. ("**FastTrack**") submits this Robocall Mitigation Program as required by **47 C.F.R. § 64.6305**.

FastTrack has fully implemented the STIR/SHAKEN authentication framework in its Internet Protocol networks, pursuant to **47 CFR § 64.6301(a)**. As detailed below, **FastTrack** has taken a number of reasonable steps to avoid originating, carrying, or processing illegal robocall traffic on its network.

1. "Know-Your-Customer" Procedures

FastTrack takes reasonable steps to prevent new and renewing customers from originating illegal calls, including through its "know-your-customer" procedures. All services provided by **FastTrack** are covered under our Master Services Agreement (MSA) that includes an Acceptable Use Policy and contractual terms and conditions. This Acceptable Use Policy states customers shall comply with all Federal, State and Local laws and ordinances that govern the use of Services. The MSA prohibits the use of such services in any way that is unlawful, harmful to or interferes with the use of **FastTrack**'s network or systems. Violations of the rules and regulations specified in the TRACED Act would be considered a violation of the terms of our service. **FastTrack** reserves the right to suspend or terminate an account without notice for engaging in such prohibited practices. **FastTrack** can block voice traffic, when necessary, although **FastTrack** never blocks emergency 911 calls. **FastTrack**'s MSA that includes the Acceptable Use Policy is available to the public on our website at www.fasttrackcomm.net.

Our subscribers are vetted through our internal onboarding process that includes the collection of information on the subscriber, including but not limited to:

1. Full legal name
2. Physical Locations of Operations
3. Contact persons (noted on the CPNI/Contact Authority Form)
4. Federal Tax ID (if applicable)
5. Nature of business

2. "Know-Your-Upstream Provider" Procedures

FastTrack has only two upstream providers, Inteliquent and Lumen. All upstream provider services used by **FastTrack** are covered under contractual terms and conditions. These upstream providers have Robocall Mitigation plans in place and published on the FCC website. Violations of the rules and regulations in the TRACED Act by our upstream providers would be considered a violation of the terms of our contracts with those providers.

FastTrack will accept calls directly from a voice service provider only if that voice service provider's filing appears in the Robocall Mitigation Database and that filing has not been de-listed pursuant to an enforcement action by the Commission.

3. Call Analytics Systems

FastTrack subscribes to TransNexus' ClearIP robocalling and fraud management tool. This tool monitors all **FastTrack**'s SIP-based voice traffic to identify potentially fraudulent activity. **FastTrack** has configured multiple automated rules which automatically block calls that exceed a variety of tuned dynamic call parameter thresholds which are we''designed to capture potentially fraudulent call activity for specific fraud scenarios. This allows **FastTrack** to prevent potentially fraudulent activity without requiring manual intervention.

Additionally, **FastTrack** has configured automated timed reports which regularly provide the engineering team with relevant analytics for monitoring fraudulent activity. **FastTrack** maintains customized rules for Reputation-based blocking and White/Blacklisting on an individual calling/called number basis, allowing for complete customization and control.

4. Commitment to Respond Fully to Traceback Requests

FastTrack commits to respond fully, within 24 hours, to valid traceback requests made by the Industry Traceback Group (ITG), U.S. government agencies (including the FCC), U.S. law enforcement, and to cooperate with such entities in investigating and stopping illegal robocallers that use **FastTrack**'s service to originate, carry, or process illegal robocalls.

FastTrack has not been the subject of a formal FCC, 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 plan description.

CERTIFICATION

Pursuant to **47 C.F.R. § 1.16**, I declare under penalty of perjury that the statements contained within the foregoing Robocall Mitigation Program are true and accurate to the best of my current information, knowledge, and belief.