

Robocall Mitigation Plan

Resound Networks, LLC

Revised May 2026

Overview

Resound Networks, LLC (“Resound” or “the Company”) is a voice service provider (VSP) dedicated to preventing illegal robocalls from originating on its network and monitoring calls traversing its network. The Company provides interconnected VoIP services as a total reseller of wholesale VoIP services provided by Atheral LLC (FRN 0028070290, RMD filing RMD0003240).

Pursuant to 47 C.F.R. § 64.6305, the FCC requires that all voice service providers certify in the Robocall Mitigation Database (RMD) that they have either: (1) fully implemented STIR/SHAKEN across their entire network; (2) implemented STIR/SHAKEN on a portion of their network with the remainder of calls subject to a Robocall Mitigation Plan (RMP); or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that illegal robocalls are not originating from the provider’s network.

FCC Filing Status – Option 3

Resound Networks has selected Option 3 in its Robocall Mitigation Database filing. As a total reseller of Atheral LLC’s interconnected VoIP services, Resound does not operate its own voice switching infrastructure, does not hold its own SPC Token, and does not have the independent capability to implement STIR/SHAKEN. All voice traffic originating on the Company’s network is subject to the robocall mitigation measures described in this plan.

Atheral LLC, the Company’s upstream wholesale VoIP provider, has fully implemented STIR/SHAKEN across its network and filed its completion notice with the FCC on January 10, 2023. Atheral holds the applicable SPC Token and performs STIR/SHAKEN call authentication and signing at the wholesale switching layer for all voice traffic originating through Resound’s network. While Resound benefits from Atheral’s STIR/SHAKEN implementation, the Company’s RMD filing accurately reflects its own status as a reseller that has not independently implemented STIR/SHAKEN. For additional detail on Atheral’s STIR/SHAKEN implementation, contact: robocall@atheral.com or 704-470-2770, ext. 1001.

Company Principals

The following individuals are the owners, officers, directors, and/or managers of Resound Networks, LLC, as required by the FCC's RMD filing instructions:

Name	Title / Role
Tyson Curtis	Chief Executive Officer (CEO)
Bryan Waldrip	Chief Operating Officer (COO)
Chadd Giles	Chief Technology Officer (CTO)
Chris Lyons	Chief Revenue Officer
Abby Fraser	Chief Marketing Officer
Jordan Pruett	Chief Strategy Officer
Cameron Smith	Director of Network Deployment
Chris Vainrib	Director of RF Engineering
Drew Facio	Director of Field Operations
Dennis Dudren	Director of OSP
Robert Taylor	Director of Project Management & Vendors

Robocall Mitigation Measures

The FCC requires that voice service providers develop a Robocall Mitigation Plan that: (a) lists the specific, reasonable steps the provider has taken to avoid originating illegal robocall traffic; (b) states a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group; and (c) commits to cooperate with entities investigating and stopping illegal robocallers that use the provider's services to originate calls.

Resound Networks purchases origination, termination, and hosted-switch access from Atheral LLC, which provides the facilities-based elements of this plan as part of its white-label interconnected VoIP wholesale services to Resound.

Know Your Customer

Resound Networks follows the best practices for vetting caller identity described by the North American Numbering Council (NANC) Call Authentication Trust Anchor Working Group (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). The Company's customer vetting procedures include:

- Verification of subscriber identity through government-issued identification and business registration documentation prior to service activation.
- Confirmation of the subscriber's physical address within the Company's service area.

- Credit and background screening for commercial VoIP accounts.
- Maintaining records of all subscriber identity documentation for the duration of the customer relationship and as required by applicable law.

International Subscribers

Resound Networks does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

Resound Networks maintains an Acceptable Use Policy ("AUP") that all subscribers must agree to before being permitted to use the Company's broadband or voice services. The AUP prohibits the use of Resound's network for originating illegal robocalls, spoofed calls, or any fraudulent or abusive calling activity. Key provisions include:

- All calls originated on the Resound Networks network are subject to inspection and investigation if a call is suspected of being fraudulent, abusive, or illegal.
- Calls meeting any of these criteria will be blocked immediately.
- Subscribers who repeatedly violate the AUP may be disconnected from Resound Networks' network and may be subject to further investigation by the FCC for enforcement of the TRACED Act, including fines and penalties imposed by the FCC or the appropriate jurisdictional court.
- Subscribers are required to comply with all traceback requests as a condition of service under the AUP.

Traceback Requests

Resound Networks is committed to responding in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the Industry Traceback Group (ITG). The Company is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use Resound's service to originate calls.

Traceback requests should be sent to regulatory@resoundnetworks.com for immediate processing by Resound Networks.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by Resound Networks or Atheral LLC, then TN validation is required. The subscriber must provide a valid Letter of Authorization (LOA) demonstrating that they are an authorized user of such TN. Upon receipt of sufficient documentation, Resound provides the LOA to Atheral LLC so that Atheral can assign the appropriate STIR/SHAKEN attestation level to calls originated with those TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Atheral LLC uses TransNexus's ClearIP solution to monitor all origination voice traffic from Resound's network in real time to prevent the origination of illegal robocalls. The ClearIP platform provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if Resound originates any calls where the calling number is invalid, unallocated, on a Do Not Originate (DNO) list, in the FCC consumer complaint database, or has a poor reputation score.

When ClearIP identifies suspicious traffic, Atheral immediately notifies Resound Networks to investigate the identified calls and determine whether the subscriber was attempting to originate unlawful robocalls. If Resound or Atheral determines that a subscriber was attempting to originate unlawful robocalls, the Company will either warn the subscriber to cease the activity or terminate their service in accordance with the AUP.

Examples of Calling Patterns Monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs. weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SCD) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling trigger monitoring for a high volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and historical Call Detail Records (CDRs) to benchmark against expected trends

Annual Compliance Review

Resound Networks conducts an annual review of this Robocall Mitigation Plan in conjunction with its annual RMD re-certification filing. The Company engages Rowland & Moore to audit compliance with applicable FCC regulations on an annual basis. The Company will update this plan as necessary to reflect changes in its operations, the regulatory environment, or best practices for robocall mitigation.

Resound Networks

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800-806-1719

The logo for Resound Networks, featuring the word "resound" in a bold, blue, sans-serif font.

Contact Information

For questions regarding this Robocall Mitigation Plan or to submit traceback requests:

Resound Networks, LLC

Email: regulatory@resoundnetworks.com

Atheral LLC Contact: robocall@atheral.com or 704-470-2770, ext. 1001