

Robocall Mitigation Program Description

FCC Registration Number (FRN): 0031368780

Business Name: StudioCart LLC DBA: Heartland Web Development

Business Address: PO Box 460844, Papillion, NE 68046

1. Measures to Prevent Illegal Robocalls

1.1 Customer Screening Procedures

We operate a PBX system that originates calls using trunks provided by STIR/SHAKEN-compliant upstream providers, including Twilio and VoIP Innovations.

- All customers are vetted during onboarding and are required to sign documentation affirming that they will not place illegal or unsolicited calls.
- We reserve the right to terminate customer relationships in the event of non-compliance with robocall mitigation policies.
- System Limitation: Our PBX system does not have the capability to dial automated outbound marketing calls or robocalls. All calls must be manually dialed by customers or end-users.

1.2 Call Monitoring and Analytics

We utilize tools and analytics provided by our upstream trunk providers (Twilio and VoIP Innovations) to monitor call activity and detect any unusual patterns that may indicate illegal robocalls.

- Calls originating from our PBX are logged and traceable via upstream provider systems.
- We conduct periodic reviews of customer accounts to ensure ongoing compliance.

1.3 Actions for Non-Compliance

We maintain a zero-tolerance policy for illegal robocalls:

- Immediate termination of the customer relationship for any verified instance of illegal robocall traffic.
- Cooperation with law enforcement and traceback organizations to address violations promptly.

2. Traceback Cooperation

2.1 Commitment to Traceback Requests

We respond to all traceback requests from the FCC, law enforcement, or the industry traceback consortium within 24 hours.

- Call logs are maintained and accessible through our upstream providers' systems, which support traceback processes.

2.2 Cooperation with Industry and Law Enforcement

We actively cooperate with industry traceback organizations, law enforcement, and other regulatory bodies to identify and stop illegal robocallers.

3. STIR/SHAKEN Implementation

3.1 STIR/SHAKEN Status

We do not have the technical capability to implement STIR/SHAKEN directly on our network. Instead:

- All calls originating from our PBX system are authenticated and terminated by

STIR/SHAKEN-compliant trunk providers (e.g., Twilio and VoIP Innovations).

- We ensure that we only use upstream providers who fully implement the STIR/SHAKEN framework, in accordance with FCC regulations.

3.2 Alternative Mitigation Measures

Since we rely on compliant upstream providers, our mitigation measures include:

- Customer vetting and monitoring.
- Ensuring upstream trunk providers have fully implemented STIR/SHAKEN.
- Immediate response to traceback requests and termination of non-compliant customers.

4. System Limitation - Manual Dialing Only

Our system does not have the capability to dial automated outbound marketing calls or robocalls. All calls made through our PBX system require manual dialing by users or customers. This limitation inherently reduces the risk of illegal robocall traffic originating from our service.

5. General Compliance Statement

We are fully committed to complying with 47 CFR § 64.6305(a) and ensuring our service is not used to originate illegal robocalls. By:

- Relying exclusively on STIR/SHAKEN-compliant trunk providers,
- Maintaining a robust robocall mitigation program,
- Implementing system limitations to prevent automated outbound dialing, and
- Cooperating with traceback organizations and law enforcement,

we ensure compliance with FCC regulations and take all reasonable steps to prevent illegal robocall traffic.