

Robocall Mitigation Plan

Bird Hosting Inc. / Innovative Scaling Technologies, Inc.

FRN: 0026515106

Updated: September 2025

Company Overview

- **Principal:** Michael Wallace, CEO
- **Address:** 600 1st Ave STE 330, PMB 31077, Seattle, WA 98104
- **Service Type:** Voice Service Provider (Originating/Intermediate)
- **Customers:** 10-20 small businesses and residential users
- **Years Operating:** 20+ years

Know Your Customer (KYC)

We follow NANC Call Authentication Trust Anchor Working Group best practices.

Requirements for new customers:

- Government-issued ID
- Business registration documents
- Proof of physical address
- Signed agreement prohibiting illegal robocalling

We do NOT serve:

- Telemarketers
- Robocallers
- Call centers
- Lead generators

Traceback Commitment

We respond to all traceback requests within 24 hours from:

- FCC Enforcement Bureau
- Industry Traceback Group (ITG)
- Law enforcement
- State attorneys general



Contact: Michael Wallace (michael@innoscale.net, 307-200-4880 x100)

Backup: Brent Presley (brent@innoscale.net, 425-999-4003)

24/7 Emergency: 911@innoscale.net / 888-722-8515

Note: Zero traceback requests received in 20+ years of operation.

STIR/SHAKEN Status

Extension Claimed: 47 CFR § 64.6304(a)(2) - Small provider exemption (fewer than 100,000 lines)

Current Lines: Less than 100 total

Implementation Target: June 30, 2026

All traffic is monitored by our robocall mitigation program while operating under this extension.

Robocall Mitigation Program

We use VoIP Innovations/Sangoma monitoring software that provides:

Real-time detection of:

- High-volume calling (auto-blocks at 200+ calls/hour)
- Short-duration call patterns
- Number spoofing
- Invalid caller ID
- Calls outside 8 AM - 9 PM

Enforcement:

- Automatic blocking of suspicious traffic
- Immediate suspension for violations
- Permanent termination for confirmed illegal robocalling

Call Abuse Policy

Published on our website and signed by all customers:

"Zero tolerance for illegal robocalling. All calls are meta monitored. Violations result in immediate termination and reporting to authorities. Penalties include FCC fines up to \$13,976 per violation and potential criminal prosecution."

Compliance Record

- **Traceback requests:** 0
- **FCC violations:** 0
- **Customer complaints:** 0
- **Years in operation:** 20+

Regulatory Disclosure

August 25, 2025 FCC Removal (DA 25-737): Administrative removal for missed annual recertification deadline. No findings of wrongdoing or illegal robocalling. Immediately corrected August 26, 2025. Provisional reinstatement granted September 3, 2025.

Record Keeping

We maintain for 24 months:

- Call Detail Records (CDRs)
- Customer documentation
- Traceback correspondence
- Compliance actions

Certification

I certify under penalty of perjury that:

1. This information is true and accurate
2. We are committed to preventing illegal robocalls
3. We will respond to all traceback requests within 24 hours
4. We do not knowingly serve any robocalling operations

Michael Wallace
Chief Executive Officer
September 2025