

ROBOCALL MITIGATION PLAN

Company Legal Name	MegaTech Services LLC
Principal Address	7735 Sarahs Meadow Ct. Suwanee GA 30024
Plan Date	September 1 2026

1. Service Overview

MegaTech Services LLC ("the Company") provides a prepaid calling card platform that authenticates calling cards and PINs and determines call routing through its proprietary application. The Company sells prepaid calling card services directly to end users. Although the Company's platform is capable of supporting distributors or resellers, no distributors or resellers currently use the service.

BulkVS provides the U.S. access numbers and domestic U.S. call termination. Telnyx provides the telephony platform, collects PIN information through its IVR, and creates the outbound call leg after receiving routing instructions from the Company's authentication platform. International calls are routed through the Company's international termination provider.

The Company operates a Session Border Controller (SBC) solely for SIP signaling. The SBC does not originate, answer, bridge, or terminate voice calls and does not process RTP media. Its function is limited to converting SIP addressing required between providers and forwarding SIP signaling.

The Company also operates a proprietary authentication platform that validates issued calling cards and PINs, verifies account status, and returns routing instructions to Telnyx before an outbound call leg is established.

Calls that fail calling card or PIN authentication are not permitted to proceed, and no outbound call leg is created.

2. STIR/SHAKEN Status

BulkVS receives inbound calls and forwards SIP signaling to the Company's SBC. The SBC transparently forwards any STIR/SHAKEN Identity headers received from BulkVS without modification to Telnyx.

Telnyx creates the outbound call leg and routes the call to a SIP URI provided by the Company. According to Telnyx, STIR/SHAKEN Identity headers are not applied to these SIP URI-routed outbound calls under its current implementation.

The Company does not generate, modify, remove, or sign STIR/SHAKEN Identity headers and does not maintain an STI certificate.

3. Know Your Customer

MegaTech Services LLC maintains information sufficient to identify each customer account and maintains records linking issued calling cards and PINs to the associated customer for operational, investigative, and traceback purposes.

Before establishing service, the Company collects and reviews, as appropriate:

- Customer name and contact information;
- Billing and payment information;
- Originating ANI information;
- Applicable daily usage limits; and
- Additional information necessary to verify the customer or resolve inconsistencies.

Accounts with incomplete, unverifiable, inconsistent, or suspicious information are not activated until the issue has been resolved.

The Company verifies the originating ANI when service is established and reverifies the ANI whenever a customer requests a change.

Existing customer accounts are reviewed when account information changes, suspicious traffic is detected, provider notifications are received, or traceback requests identify potential misuse.

4. Know Your Upstream and Underlying Providers

The Company performs due diligence on each voice service provider participating in its call path, including BulkVS, Telnyx, and its international termination provider.

Before establishing service, the Company confirms each provider's legal identity, role within the call flow, regulatory status, and Robocall Mitigation Database listing, where applicable.

The Company periodically reviews its upstream providers and will investigate, restrict, suspend, or terminate any provider relationship presenting an unreasonable risk of facilitating illegal traffic or failing to comply with applicable FCC requirements.

5. Traffic Monitoring and Mitigation

The Company's proprietary authentication platform maintains authentication records and call detail records sufficient to support billing, operational review, compliance activities, and traceback investigations.

Because every outbound call requires successful validation of an issued calling card or PIN before routing instructions are issued, the Company can associate call activity with the responsible customer account and investigate suspicious traffic accordingly.

The Company reviews authentication records, call detail records, provider notifications, carrier alerts, traceback requests, and other available operational information for indicators of illegal robocalling, spoofing, fraud, or misuse.

Review criteria include:

- Unusually high call volume;
- Sequential or rapid dialing activity;
- Repetitive destination patterns;
- Short-duration calls;
- Repeated failed PIN authentication attempts;

- Complaints;
- Traceback requests;
- Carrier notifications; and
- Other abnormal traffic patterns.

The Company supplements its own monitoring through the fraud detection, traceback, STIR/SHAKEN, and abuse mitigation programs maintained by its underlying service providers.

When suspicious activity is identified, the Company investigates the associated customer account, issued calling cards, PINs, caller identification, payment records, destinations, and available call detail records.

Depending upon the circumstances, the Company may:

- Request additional customer verification;
- Apply account, PIN, ANI, destination, or call-volume restrictions;
- Block individual destination countries or destination prefixes;
- Suspend or terminate customer accounts, calling cards, or PINs;
- Coordinate mitigation activities with BulkVS, Telnyx, or the Company's international carrier; and
- Preserve records for traceback or law enforcement purposes.

Because the Company controls its own authentication platform, it can immediately suspend or terminate access for any distributor account, calling card, or PIN associated with suspected illegal traffic without waiting for action by an underlying provider.

6. Traceback and Cooperation

MegaTech Services LLC commits to respond promptly, and in all cases within 24 hours, to traceback requests received from the FCC, the Industry Traceback Group, law enforcement agencies, or other authorized entities.

The Company maintains authentication records and call detail records sufficient to support traceback investigations and cooperates fully in identifying and stopping illegal robocall traffic associated with its services.

Traceback Contact

Yousuf Makda
President

support@megatechservices.com

678-288-7155

7. Ongoing Compliance

MegaTech Services LLC is committed to maintaining and continuously improving its robocall mitigation program.

Ongoing compliance activities include:

- Updating its Robocall Mitigation Database filing within ten business days whenever required filing information changes;
- Periodic review and enhancement of its mitigation procedures to address emerging threats and regulatory developments;
- Periodic review of upstream provider compliance;
- Employee training regarding robocall mitigation procedures and traceback response; and
- Participation in industry initiatives and best practices supporting the prevention of illegal robocalls.

8. Prior Regulatory or Enforcement Actions

During the preceding two years, neither MegaTech Services LLC nor any entity sharing common ownership, management, directors, or control with the Company has been the subject of any formal FCC, law enforcement, or regulatory enforcement action resulting in findings of illegal robocalling, unlawful caller ID spoofing, or deficiencies in its Robocall Mitigation Database certification or mitigation program.