

REDACTED VERSION – FOR PUBLIC INSPECTION

**Robocall Mitigation Program for
Rave Wireless, Inc., Swiftreach Networks, Inc.
and Swiftreach Wholesale Services, LLC
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This Robocall Mitigation Program (“Program”) to be filed in the Federal Communications Commission (“FCC” or “Commission”) Robocall Mitigation Database (“RMD”) applies to Rave Wireless, Inc., Swiftreach Networks, Inc. and Swiftreach Wholesale Services, LLC (the “company”).

1. Provider Type Explanation (47 CFR § 64.6305(d)(2)(i))

The company is not a voice service provider or otherwise a covered provider as defined by the TRACED Act or FCC rules and therefore does not have an obligation to implement STIR/SHAKEN or file a Robocall Mitigation Program. Moreover, the company lacks the qualifications to even obtain an SPC token for STIR/SHAKEN implementation. However, the company has adopted and filed this Program out of an abundance of caution to aid the robocall mitigation efforts of the FCC and other stakeholders. Since the RMD does not have an option for “not a covered provider,” the company has selected “voice service provider without a STIR/SHAKEN obligation” as the closest option.

2. Traceback Commitment (47 CFR § 64.6305(d)(2)(iii))

The company commits to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

3. Robocall Mitigation Database Certification (47 CFR § 64.6305(d)(1))

The company certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

4. Investigation Certification (47 CFR § 64.6305(d)(2)(iv)).

The company certifies that it is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

5. Robocall Mitigation Techniques (47 CFR § 64.6305(d)(2)(ii))

- a. How the company is meeting the obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, including related contractual provisions.**

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[REDACTED]

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- b. “Know-your-upstream provider” procedures in place designed to mitigate illegal robocalls, including related contractual provisions.

[REDACTED]

- c. Call analytics systems used to identify and block illegal traffic.

[REDACTED]

[REDACTED]

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