

ROBOCALL MITIGATION PLAN:

Hurdman Communications

Date: February 2026 **Filing Type:** Annual Recertification

1. Introduction and Scope

Hurdman Communications (“the Company”) provides IVR SAAS services. The Company’s network architecture is designed exclusively for **inbound-only traffic**.

The Company’s services do not possess the technical facility to originate outbound calls to the Public Switched Telephone Network (PSTN). As such, while the Company is a "Voice Service Provider" under FCC definitions, it does not currently engage in the authentication of outbound traffic via STIR/SHAKEN frameworks because no such traffic exists.

2. Monitoring and Mitigation of Illegal Traffic

Even as an inbound provider, Hurdman Communications takes proactive steps to ensure its network is not a destination for illegal traffic:

- **Traffic Pattern Analysis:** The Company monitors inbound traffic for anomalies, such as extreme spikes in volume to a single DID, which may indicate that the number is being used in an active scam campaign.
- **Investigation:** If a DID is flagged, the Company investigates the customer’s traffic. If the traffic is found to be associated with illegal robocalling, the Company reserves the right to suspend or terminate the DID immediately.

3. Cooperation with Traceback Efforts

The Company is committed to maintaining the integrity of the voice ecosystem and fully cooperates with the **Industry Traceback Group (ITG)** and law enforcement.

- **Response Time:** The Company commits to responding to all traceback requests within **24 hours** of receipt.
- **Information Sharing:** Upon receiving a valid traceback request, the Company will identify the upstream provider from which the call originated to assist in locating the source of illegal traffic.

4. Enforcement and Termination

Pursuant to Company policy, Hurdman Communications maintains a "zero tolerance" policy for illegal activity.

- **Termination:** If the FCC, ITG, or law enforcement provides evidence that a customer is using Company resources to facilitate illegal robocalling, that customer's service will be terminated.
- **Reporting:** The Company will cooperate with any subsequent regulatory inquiries regarding terminated customers.