

Robocall Mitigation Program Description

Filer: Estream Inc.

FRN: 0031422611

Business Address: 22912 Mill Creek Dr, Ste A, Laguna Hills, CA 92653

Date: July 10, 2026

Provider Type: Voice Service Provider

1. Introduction and Statement of Commitment

Estream Inc. ("the Company") submits this Robocall Mitigation Program Description pursuant to 47 CFR § 64.6305(d) and the Federal Communications Commission's ("FCC" or "Commission") rules governing the Robocall Mitigation Database. The Company is committed to combatting illegal robocalls and to taking reasonable steps to avoid originating illegal robocall traffic on its network.

This program describes the specific measures the Company has implemented to prevent illegal robocalls, identify suspicious traffic, cooperate with traceback requests, and respond to enforcement actions by the FCC, law enforcement, and the industry traceback consortium.

2. Company Overview

Estream Inc. is a recruiting software company providing companies the ability to track applicants and move applicants through the hiring pipeline for offices throughout the United States.

The Company serves end-users directly and acts as a wholesale provider. The Company's network is all IP.

The Company has approximately 1,200 customers and originates approximately 15,000 calls per day on average.

3. STIR/SHAKEN Implementation Status

The Company certifies to **No Implementation** of the STIR/SHAKEN caller identification authentication framework under 47 CFR § 64.6301, and identifies the basis described below as its exemption from this requirement.

Basis for exemption: The Company is a non-facilities-based voice service provider. The Company offers voice service to its end users solely using connections that are not sold by the Company or its affiliates: 100% of the Company's voice traffic rides atop the network, switching, and call-signing infrastructure owned and operated by its underlying carrier, Bandwidth, Inc. The Company does not own, lease, or operate any network switching, routing, or call-signing infrastructure of its own, and has no facilities-based voice connections. Because the Company cannot install STIR/SHAKEN signing infrastructure on network elements it neither owns nor controls, it lacks the ability to implement the STIR/SHAKEN authentication framework directly. The Company holds Operating Company Number (OCN) 375M, assigned under the IPES (Interconnected VoIP / IP-Enabled Services) category through the National Exchange Carrier Association (NECA), for administrative and billing identification purposes; the Company does not hold a Service Provider Code (SPC) token issued by the STI-PA (Policy Administrator) and has no independent capability to sign calls. All voice origination, routing, and call-signing functions for the Company's traffic are

performed exclusively by Bandwidth. The Company does not rely upon, and does not assert, the small voice service provider extensions under 47 CFR § 64.6304, which expired on June 30, 2022 (non-facilities-based providers) and June 30, 2023 (facilities-based providers with fewer than 100,000 subscriber lines); the basis for this certification is instead the Company's status as a non-facilities-based provider that lacks control over the network infrastructure necessary to implement STIR/SHAKEN directly.

Coverage through underlying carrier: Although the Company does not itself implement STIR/SHAKEN, Bandwidth, Inc. has confirmed that it authenticates and signs 100% of the call traffic the Company originates, with the appropriate attestation level (A, B, or C) assigned to every call in accordance with 47 CFR § 64.6301, with no carve-out or unsigned portion of the Company's originated traffic. The Company understands that, upon reinstatement of its certification in the Robocall Mitigation Database, its traffic will continue to be fully covered by Bandwidth's STIR/SHAKEN implementation.

4. Customer Due Diligence ("Know Your Customer")

The Company applies "Know Your Customer" (KYC) procedures to all new and existing customers to ensure that its services are not used to originate illegal robocall traffic. These procedures include:

- **Identity verification.** Before activating service, the Company collects and verifies the customer's legal business name, business address, FRN (if applicable), tax identification number, and primary contact information.
- **Beneficial ownership.** For business customers, the Company identifies the beneficial owners and principals of the customer entity.
- **Use case review.** The Company reviews each customer's intended use of the service (e.g., outbound calling volume, target geographies, calling campaigns) and declines service to applicants whose intended use raises significant compliance concerns.
- **Watchlist screening.** The Company screens prospective customers against publicly available lists of entities subject to FCC enforcement actions, FTC actions, state attorney general actions, and industry traceback findings.
- **Periodic re-verification.** The Company periodically re-verifies customer information for existing accounts to detect changes in ownership, use case, or risk profile.

5. Acceptable Use Policy and Contractual Provisions

All customer agreements include an Acceptable Use Policy ("AUP") that:

- Expressly prohibits the use of the Company's services to originate, transmit, or facilitate any unlawful call, including but not limited to calls that violate the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, FCC robocall rules, or any state or federal consumer protection law.
- Prohibits the spoofing of caller ID with intent to defraud, cause harm, or wrongfully obtain anything of value.
- Requires customers to maintain documented consent for any calls made to consumers as required under applicable law.
- Authorizes the Company to suspend or terminate service immediately upon evidence of illegal calling activity.
- Requires customers to cooperate with the Company in any traceback or enforcement investigation.

6. Traffic Monitoring and Analytics

The Company monitors call traffic on its network for indicators of illegal robocall activity, including:

- Abnormally high call volumes or short-duration (“dial-and-hang-up”) calling patterns
- High rates of unanswered or rejected calls
- Calls with mismatched, invalid, or unallocated calling numbers
- Calls to numbers on the National Do Not Call Registry
- Patterns consistent with neighbor spoofing or number cycling
- Consumer complaints or reports received via Estream Inc. complaint channels

The Company uses internal analytics tools and third-party traffic-monitoring services provided by Bandwidth to identify and investigate suspicious traffic.

When suspicious traffic is detected, the Company promptly contacts the originating customer for explanation, may impose temporary call-volume caps, and may suspend or terminate services if the customer fails to provide a satisfactory response.

7. Traceback Response Procedures

The Company commits to respond fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium (the USTelecom Industry Traceback Group, or “ITG”).

Specifically, the Company:

- Designates a primary point of contact (identified in Section 12 below) responsible for receiving and responding to traceback requests.
- Maintains call detail records (CDRs) sufficient to identify the source of any call originated, transited, or terminated on its network for at least 12 months.
- Provides upstream call source information (originating customer, signaling details, timestamps) within 24 hours of receiving a valid traceback request.
- If the call originated with a customer of the Company, takes appropriate action against that customer in accordance with Section 9 below.
- Cooperates with the requestor in any follow-up inquiry or investigation.

8. Enforcement Action History

eStream, Inc. (FRN 0031422611, RMD File No. RMD0007245) has been subject to enforcement action by the Federal Communications Commission, as described below.

(1) Agencies involved: The FCC Enforcement Bureau and the FCC Wireline Competition Bureau (WCB).

(2) Dates of action: On March 29, 2024, WCB notified the Company that its Robocall Mitigation Database certification was noncompliant with the requirements of 47 CFR § 64.6305, as amended effective February 26, 2024, and directed the Company to submit an updated certification and robocall mitigation plan by April 29, 2024. On December 10, 2024, the Bureau issued a Show Cause Order (EB-TCD-24-00036891) directing the Company, among 2,411 providers, to cure its deficiencies within 14 days of publication in the Federal Register or explain why its certification should not be removed from the RMD. The compliance

deadline was December 31, 2024.

(3) Current status: The Company has received authorization from the Wireline Competition Bureau and the Enforcement Bureau to refile its RMD certification. As part of curing the deficiencies identified by Commission staff, the Company has revised its certification of STIR/SHAKEN implementation status as described in Section 3 above, and is submitting this compliant certification and updated Robocall Mitigation Program.

(4) Summary of findings: The Company's RMD certification was found to be deficient because (a) a compliant robocall mitigation plan was not provided or the plan lacked information required to be submitted by February 26, 2024, and (b) the certification lacked information required by the amended rules at 47 CFR § 64.6305. Specifically, the Company had not submitted an updated RMD certification and updated robocall mitigation plan with the information required by the February 26, 2024 amendments to Section 64.6305. The August 25, 2025 Order also noted that many of the companies listed in the Order had transmitted suspected illegal robocalls and had failed to respond to traceback requests.

(5) Final determinations: On August 25, 2025, the Enforcement Bureau issued a final Order, In the Matter of Robocall Mitigation Database Filers, DA 25-737 (Case No. EB-TCD-25-00038590), immediately removing the Company's certification from the Robocall Mitigation Database. The Order directed all intermediate providers and voice service providers to cease accepting traffic directly from the Company within two business days of the release date of the Order. No monetary forfeiture was imposed. The Company was ordered not to refile in the RMD unless and until both the Wireline Competition Bureau and the Enforcement Bureau consented.

9. Investigation, Enforcement, and Termination

When the Company receives evidence — through traceback, customer complaint, regulatory inquiry, or its own monitoring — that a customer is originating illegal robocall traffic, the Company:

- Promptly investigates the allegation, including reviewing relevant CDRs, customer documentation, and consent records.
- Contacts the customer to demand explanation and remediation.
- Suspends service to the customer if the conduct continues or if the evidence is sufficiently clear and material.
- Terminates service to the customer for repeat or egregious violations.
- Documents all such actions and retains documentation for at least 1 year.
- Reports the customer's identity to the ITG and to relevant regulators where appropriate.

The Company will not knowingly accept traffic from any customer that has been the subject of an FCC § 64.1200(n)(2) enforcement notice or similar regulatory action without first conducting enhanced due diligence.

10. Cooperation with the FCC, Law Enforcement, and the Industry Traceback Consortium

The Company will cooperate fully with the FCC, law enforcement (including state attorneys general and the U.S. Department of Justice), and the industry traceback consortium in investigating and stopping illegal

robocallers that use the Company's service to originate calls. This cooperation includes:

- Providing call records, customer information, and other relevant evidence in response to lawful requests
- Participating in industry-wide traceback efforts
- Reporting suspected illegal robocall activity to appropriate authorities
- Implementing any additional mitigation measures requested by such entities to the extent technically feasible

11. Internal Training and Compliance

The Company maintains internal policies and procedures that ensure operational personnel understand and comply with applicable robocall mitigation rules. Personnel involved in customer onboarding, network operations, and compliance receive both onboarding and annual training on robocall mitigation requirements, traceback procedures, and the Company's internal escalation procedures.

12. Point of Contact for Robocall Mitigation Matters

All traceback requests, regulatory inquiries, and law enforcement requests related to robocall mitigation should be directed to:

Name: Travis Clater

Title: Vice President

Department: Software

Email: tclater@estream.com

Phone: (949) 701-2903

Address: 22912 Mill Creek Dr, Ste A, Laguna Hills, CA 92653

This contact is available during regular business hours and monitors the listed email address for time-sensitive traceback requests.

13. Recordkeeping and Program Review

The Company retains call detail records, customer due-diligence records, traceback correspondence, and enforcement actions for a period of at least 12 months. The Company reviews this Robocall Mitigation Program at least annually and updates it as necessary to reflect changes in the regulatory environment, the Company's network and operations, and emerging robocall threats.

14. Certification

Estream Inc. certifies that the foregoing Robocall Mitigation Program is currently in effect and that the Company has taken and continues to take the steps described above to mitigate the origination of illegal robocall traffic on its network. The Company further certifies to No Implementation of the STIR/SHAKEN caller identification authentication framework on the basis of the exemption described in Section 3 above — namely, that the Company lacks the network infrastructure and facilities necessary to implement STIR/SHAKEN directly. The Company's originated call traffic is nonetheless authenticated in full by its underlying carrier, Bandwidth, Inc., as described in Section 3.

The Company acknowledges that its prior RMD certification was removed by Commission action on August 25, 2025, pursuant to the Order in DA 25-737, and that the Company is refiling with the authorization of the Wireline Competition Bureau and the Enforcement Bureau.

Signed,

Travis Clater
Vice President
Estream Inc.
Date: July 10, 2026