

Sharktek Consulting Services, LLC

Robocall Mitigation Program Certification

47 C.F.R. §§ 64.6301 and 64.6305

Filer ID: 838038

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Reporting Period: January 1, 2025 – December 31, 2025

Officer Certification

I, Bryan Hunt, hereby certify that I am the President of Sharktek Consulting Services, LLC (“Sharktek” or the “Company”) and that I am authorized to make this certification on behalf of the Company. I have personal knowledge that Sharktek has established and implemented operating procedures that are adequate to ensure compliance with the Federal Communications Commission’s rules governing caller ID authentication and robocall mitigation, including 47 C.F.R. §§ 64.6301 and 64.6305.

Sharktek has implemented a robocall mitigation program reasonably designed to prevent the origination and transmission of illegal robocalls and to ensure compliance with all applicable FCC regulations.

STIR/SHAKEN Implementation

Sharktek Consulting Services, LLC is an interconnected Voice over Internet Protocol (VoIP) provider as defined in 47 C.F.R. § 9.3.

Sharktek has fully implemented the STIR/SHAKEN caller ID authentication framework in the IP portions of its network in compliance with 47 C.F.R. § 64.6301.

Specifically, the Company:

- Authenticates caller ID information for outbound calls originating on its network.
- Applies appropriate attestation levels (A, B, or C) consistent with its knowledge of the calling party and its relationship to the numbering resources used.
- Maintains control and verification procedures over numbering resources assigned to customers.
- Performs verification of inbound IP calls where technically feasible.
- Maintains compliance with the STI Governance Authority (STI-GA) policies and certificate management requirements.

Robocall Mitigation Program

Pursuant to 47 C.F.R. § 64.6305, Sharktek has implemented a robocall mitigation program designed to prevent the origination of illegal robocalls on its network.

1. Know-Your-Customer (KYC) Procedures

Prior to activating service, Sharktek:

- Verifies customer identity and, where applicable, business registration documentation.
- Confirms valid contact information and physical presence.
- Reviews the intended use of services.
- Evaluates potential risk factors, including anticipated call volume and calling patterns.

Customer service agreements expressly prohibit:

- The origination of illegal robocalls.
- Caller ID spoofing or use of misleading or inaccurate caller ID information.
- Transmission of fraudulent, deceptive, or unlawful traffic.

Violation of these terms may result in immediate suspension or termination of service.

2. Traffic Monitoring and Analytics

Sharktek monitors outbound traffic patterns to identify indicators of potentially illegal robocall activity.

Monitoring includes review of:

- High-volume, short-duration calls.
- Sudden or unexplained traffic spikes.
- Sequential dialing patterns.
- Elevated call failure rates.
- Abnormal answer-to-seizure ratios.

Traffic anomalies are escalated for internal compliance review. Where warranted, accounts are investigated and appropriate mitigation measures are implemented.

3. Do-Not-Originate (DNO) List

Sharktek maintains and enforces a Do-Not-Originate (DNO) list to prevent the origination of calls using numbers that:

- Are invalid or unallocated.
- Are government numbers.
- Are inbound-only numbers.
- Have been identified through traceback notifications or industry alerts as associated with fraudulent activity.

Outbound calls are screened against the DNO list and blocked when matches are detected.

4. Traceback Cooperation

Sharktek:

- Maintains a designated point of contact for Industry Traceback Group (ITG) requests.
- Responds fully and in a timely manner to traceback inquiries.
- Investigates identified traffic promptly upon notification.
- Suspends or terminates customers responsible for confirmed illegal robocall activity.
- Cooperates with upstream carriers, the FCC, and law enforcement authorities as required.

5. Enforcement and Mitigation Actions

If illegal robocall activity is detected or confirmed, Sharktek will:

- Immediately investigate the originating account.
- Suspend or terminate service where appropriate.
- Block suspicious or unlawful traffic.
- Notify upstream providers if required.
- Maintain documentation of investigative findings and remedial actions.

Upstream Providers

Bandwidth

Nature of Business: Long Distance Provider

Network Location: Diverse

Contact: Support

Phone: 855-864-7776

Email: support@bandwidth.com

Sinch

Nature of Business: Long Distance Provider

Network Location: Diverse

Contact: Support

Email: support@intelliquent.com

Sharktek ensures that its upstream providers are listed in the FCC Robocall Mitigation Database and comply with applicable STIR/SHAKEN and robocall mitigation requirements.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

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Bryan Hunt

President

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Date: 2/25/26