

Oldham Technology, Inc.  
1180 N. Mountain Springs Pkwy  
Springville, UT 84663

To whom it may concern,

Pursuant to the requirements set forth in 47 CRF § 64.6305(d)(ii)-(iii), Oldham Technology, Inc., hereafter referred to as "Oldham", provides the following Robocall Mitigation Program Description.

(i) While Oldham qualifies as a small voice service provider under § 64.6304(a)(2), it did not file for an extension beyond June 30, 2022.

(ii) In order to comply with its obligations under the Robocall Mitigation Program, Oldham performs an EDOCS search once every 30 days for new 22-174 listings, and responds as required if a customer of Oldham has been listed with a Determination Robocall Order. Oldham further watches for any EDOCS 22-174 listings for its upstream provider(s) and reviews all communication from provider(s) in a timely manner. Oldham has its own internally created analytics systems in place to monitor and review customer calls to identify and block illegal traffic. Furthermore, Oldham uses systems provided by its provider(s) as an additional check to verify that traffic is identified correctly and compliance is ensured.

(iii) Oldham is committed 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 services to originate calls.

(iv) Oldham has not, nor has any entity for which Oldham shares common ownership, management, directors or control, been subject to a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to Oldham transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 3/29/2024.

  
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Robert Oldham, Manager