



Robocall Mitigation Plan

Innovative Tech Pros, Corp.

FRN: 0022159495

RMD ID: RMD0007966

Business Address: 350 Sevilla Ave, Suite 202, Miami, FL 33134

Robocall Mitigation Contact:

Name: Caesar Engroba

Title: President

Phone: (305) 914-3701

Email: caesar@itpscorp.com

Operational / Traceback Contact:

Name: Daniel Ramos

Title: Network Engineer

Phone: (305) 914-3701 ext. 2

Email: daniel@itpscorp.com

1. Provider Identification

Innovative Tech Pros, Corp. provides interconnected VoIP services in the United States as an originating voice service provider. Our FCC FRN is 0022159495, and our Robocall Mitigation Database filing number is RMD0007966. Innovative Tech Pros, Corp. is a Florida corporation with its principal place of business at 350 Sevilla Avenue, Suite 202, Miami, FL 33134. Innovative Tech Pros, Corp. has no parent entity.

2. STIR/SHAKEN Status — Complete Implementation

Innovative Tech Pros, Corp. has fully implemented the STIR/SHAKEN authentication framework on the Internet Protocol portions of its network. All eligible originating traffic is signed in accordance with ATIS-1000074 and ATIS-1000080 standards using certificates issued under the STI-PA governance framework administered by iconectiv. STIR/SHAKEN authorization for all telephone numbers under Innovative Tech Pros, Corp.'s service is provided on an Operating Company Number (OCN) basis. The Company's network is fully IP-based; there are no non-IP segments.

Despite full implementation, STIR/SHAKEN alone does not prevent illegal robocalls. Therefore, Innovative Tech Pros, Corp. applies its robocall mitigation procedures to all originating calls, regardless of attestation level.

3. Robocall Mitigation Program (Applies to ALL Traffic)

3.1 Know Your Customer (KYC)

Use of Third-Party Analytics Vendor: Innovative Tech Pros, Corp. does NOT use a third-party analytics vendor for any element of its KYC program or its call-analytics monitoring. All KYC identity verification, business legitimacy validation, documentation review, customer risk tiering, and traffic analytics are performed in-house by Company personnel on Company-managed infrastructure. The Company may use commercial business-records lookup services (such as Secretary of State corporate registry portals and IRS EIN verification) as reference data sources, but no third party makes KYC decisions, scores customers, or operates any portion of the Company's call-analytics or traffic-monitoring infrastructure.

Affirmative Measures to Prevent Origination of Illegal Robocalls by New and Renewing Customers. Pursuant to 47 CFR § 64.6305(d)(2)(ii)(A), Innovative Tech Pros, Corp. applies the following affirmative measures to every new customer at onboarding and to every existing customer at renewal:

Identity and Business Verification:

Legal entity verification against the relevant Secretary of State business registry; the matching record is retained in the customer file.

Employer Identification Number (EIN) verification against IRS records, matched to the legal entity name on file.

Government-issued photo identification for the individual executing the service agreement, together with verification of that individual's authority to bind the entity (officer title, operating-agreement signatory provision, or corporate resolution).

Physical address verification through an independent source (commercial address-verification database, utility bill, or property records). Mailbox-only addresses or virtual offices trigger enhanced due diligence.

Bank account verification confirming the payment account is held in the legal name of the customer entity.

Caller-ID number ownership verification before any telephone number is provisioned for outbound use. Where the customer wishes to display a number not subscribed on the Company's platform, the customer must provide a signed Letter of Authorization from the rightful subscriber.

Use-Case and Traffic Profile Review:

Every prospective customer completes a written Use-Case Disclosure describing the nature of the business, intended purpose of outbound calling, expected calling volume per business day, expected average call duration, geographic scope of called parties, and source of called-party lists. Stated use cases involving outbound dialing campaigns, predictive dialers, broadcast messaging, lead generation, debt collection, political or survey calling trigger enhanced due diligence. Innovative Tech Pros, Corp. refuses service to any prospective customer whose stated use case is unlawful, who declines to provide a Use-Case Disclosure, or whose disclosure is materially inconsistent with other verification evidence.

Customer Risk Tiering:

Each customer is assigned to one of three risk tiers at onboarding, which governs monitoring intensity:

Standard tier: Established business, inbound or low-volume outbound, no high-risk use case indicators. Baseline SIP analytics with monthly summary review.

Elevated tier: New business (under twelve months), medium outbound volume, or use case includes outbound sales, lead generation, or appointment outreach. Baseline analytics plus weekly summary review and first-thirty-days enhanced sampling.

Enhanced tier: High outbound volume, predictive dialer use, debt collection, political/survey calling, or any factor triggering enhanced due diligence. Real-time alerting plus documented monthly KYC re-verification.

Enhanced Due Diligence Triggers:

Any one of the following factors triggers enhanced due diligence (documented supervisor review, additional documentation requests, and Enhanced-tier monitoring): customer entity formed within the prior twelve months; regulated business activity (debt collection, consumer lending, mortgage, insurance, healthcare marketing, political campaign, telemarketing) without evidence of applicable licensure; caller-ID display name or numbers materially differing from the customer's legal entity name without a documented branding rationale; mismatch between legal entity name, EIN, billing address, or beneficial-ownership representation; prior FCC, FTC, or state attorney general consumer-protection action involving the customer, prior carrier termination for traffic concerns, or appearance on a published traceback consortium watchlist; or outbound dialing in excess of 5,000 calls per day, use of a predictive dialer, or use of pre-recorded voice messages.

Periodic Re-Verification:

KYC information is re-verified at least annually for Standard-tier customers, semi-annually for Elevated-tier customers, and monthly for Enhanced-tier customers. Re-verification includes confirming continued good standing on the Secretary of State registry, re-validating the authorized contact, and reviewing the prior period's traffic against the customer's stated use case. Material changes to the customer's business, ownership, or traffic profile trigger immediate re-tiering.

3.2 Internal Traffic Analytics

Pursuant to 47 CFR § 64.6305(d)(2)(ii)(B), Innovative Tech Pros, Corp. operates an in-house SIP-based call analytics platform that ingests Call Detail Records and SIP session metadata from the Company's session-border-controller and softswitch infrastructure in near real time. The platform is hosted on Company-managed infrastructure; no third-party vendor processes, stores, scores, or makes decisions about Company traffic.

Indicators monitored on all originating traffic, regardless of STIR/SHAKEN attestation level:

Calls-per-minute and calls-per-hour against the customer's baseline and stated expected volume

Short-duration call ratio (calls under six seconds as a percentage of total attempts)

Answer/seizure ratio and average call duration anomalies

Sequential or pattern dialing across number ranges

Repeat dialing of the same called number within compressed windows

Geographic concentration of called parties inconsistent with the customer's stated geographic scope

Outbound calls to known high-risk destinations or numbers recently subject to traceback activity

Calling-number (ANI) irregularities, including use of numbers not provisioned to the customer or outside the customer's rate-center footprint without a documented branding rationale

Activity outside the customer's stated business hours or use case

Indicator thresholds are tuned to the customer's risk tier. Alerts are reviewed by a Company technician within one business hour during business hours and the following business morning for after-hours alerts. Confirmed anomalies are escalated to the Robocall Mitigation Contact for action under Section 3.3.

3.3 Mitigation Actions

If suspicious traffic is detected, Innovative Tech Pros, Corp.:

Opens an internal incident record and preserves associated CDRs and SIP traces

Contacts the customer for written explanation, campaign details, and call-list provenance

Throttles outbound capacity to a documented safe rate pending review

Suspends outbound service pending resolution where evidence of illegal traffic is present

Permanently terminates service for confirmed violations

Documents each action, supporting evidence, personnel involved, and the disposition in the customer compliance file

Escalates confirmed illegal-traffic incidents to the Industry Traceback Group, affected upstream and downstream carriers, and the FCC when appropriate

3.4 Complaint Handling

Innovative Tech Pros, Corp. reviews and acts upon complaints from:

End users

Consumer complaints forwarded by regulators

Upstream and downstream carrier alerts

Industry Traceback Group notifications

Federal and state regulatory agencies

Patterns of complaints attributable to a single customer or customer group trigger investigation under Section 3.3, regardless of whether the underlying traffic has independently triggered an analytics alert.

3.5 Traceback Cooperation

Pursuant to 47 CFR § 64.6305(d)(2)(iv), Innovative Tech Pros, Corp. commits to respond fully and within twenty-four (24) hours to all traceback requests from the Industry Traceback Group (USTelecom ITG), the FCC, law enforcement agencies, and upstream and downstream carriers. The Company maintains a monitored mailbox and on-call contact path to ensure after-hours traceback requests are not delayed beyond this commitment.

3.6 Know-Your-Upstream-Provider Procedures

Pursuant to 47 CFR § 64.6305(d)(2)(ii)(C), Innovative Tech Pros, Corp. operates primarily as an originating voice service provider for its own end-user customers. To the extent the Company accepts any voice traffic from an upstream provider for further routing, the Company will, prior to interconnection:

Confirm the upstream provider holds a current, non-deficient RMD filing and has not been subject to a Commission removal order

Obtain the upstream provider's STIR/SHAKEN implementation status and OCN, and verify the signing certificate is current

Obtain a written representation of the upstream provider's robocall mitigation program and traceback-response commitment

Reserve the contractual right to suspend or terminate the upstream relationship in the event of repeated traceback non-response, traffic-quality issues, or RMD removal

3.7 Recordkeeping

Innovative Tech Pros, Corp. retains KYC documentation, Use-Case Disclosures, analytics alert records, mitigation-action records, traceback correspondence, and complaint files for a minimum of three (3) years from the date of creation or termination of the underlying customer relationship, whichever is later.

4. Prior Commission and Law Enforcement Actions or Investigations

Pursuant to 47 CFR § 64.6305(d)(2)(iii), Innovative Tech Pros, Corp. describes each action or investigation by the Commission or other law enforcement agency in the prior two years.

4.1 Show Cause Order (December 10, 2024) and Final Removal Order (August 25, 2025)

(1) Law enforcement or regulatory agencies involved: Federal Communications Commission, Enforcement Bureau (Telecommunications Consumers Division) and Wireline Competition Bureau. No state attorney general, U.S. Department of Justice, Federal Trade Commission, or other federal or state agency has been involved in this matter.

(2) Date the action or investigation commenced: The underlying compliance review commenced on March 29, 2024, when the Wireline Competition Bureau notified Innovative Tech Pros, Corp. by email that its RMD certification did not reflect the updated information required by the February 26, 2024 effective date of the amended section 64.6305. The formal action commenced on December 10, 2024, with the release of the Bureau's Order, In the Matter of 2,411 Robocall Mitigation Database Filers, 39 FCC Rcd 13318 (EB 2024) (Show Cause Order), which named Innovative Tech Pros, Corp. among the 2,411 filers required to cure deficiencies or show cause why their RMD certifications should not be removed. The matter was assigned investigation File No. EB-TCD-24-00036891 and subsequently EB-TCD-25-00038590.

(3) Current status of the action or investigation: By Order DA 25-737, released August 25, 2025, the Enforcement Bureau removed Innovative Tech Pros, Corp.'s RMD certification (along with the certifications of more than 1,200 other filers listed in Appendix A of that Order). Innovative Tech Pros, Corp. filed a new RMD certification, which was provisionally reinstated by the Bureau on August 29, 2025. By email dated December 10, 2025, the Bureau identified specific deficiencies in the provisionally reinstated filing and directed Innovative Tech Pros, Corp. to cure those deficiencies within fourteen (14) days. This revised Plan and the accompanying updated RMD certification are filed in response to and in full compliance with that December 10, 2025 directive. No monetary forfeiture has been proposed or imposed against Innovative Tech Pros, Corp. No civil or criminal proceeding is pending. The matter remains under the supervision of the Enforcement Bureau pending the Bureau's review of this cure filing.

(4) Summary of findings of wrongdoing made in connection with the action or investigation: The Bureau's findings are administrative in nature and relate exclusively to the completeness of Innovative Tech Pros, Corp.'s RMD filing. Specifically, the Bureau found that Innovative Tech Pros, Corp.'s prior RMD certification and robocall mitigation plan did not contain all of the information required to be submitted by the February 26, 2024 deadline established in the Sixth Caller ID Authentication Report and Order and the Seventh Call Blocking Order, and that Innovative Tech Pros, Corp. did not timely respond to the Show Cause Order. The Bureau's August 25, 2025 Order did NOT find that Innovative Tech Pros, Corp. originated, carried, or processed illegal robocall traffic. The Bureau did NOT find that Innovative Tech Pros, Corp. failed to respond to traceback requests. The Bureau did NOT find any STIR/SHAKEN signing violation. The Bureau did NOT find any violation of the Telephone Consumer Protection Act, the TRACED Act, or any other consumer-protection statute. The deficiency identified was solely a failure to update Innovative Tech Pros, Corp.'s RMD filing to incorporate the expanded informational requirements that took effect February 26, 2024.

(5) Whether any final determinations have been issued: Yes. Order DA 25-737, adopted and released August 25, 2025, was a final determination removing Innovative Tech Pros, Corp.'s then-existing RMD certification. Innovative Tech Pros, Corp. did not seek reconsideration or appeal of that Order; instead, Innovative Tech Pros, Corp. filed a new RMD certification, which was provisionally reinstated on August 29, 2025. No final determination has been issued with respect to the December 10, 2025 deficiency notice; that matter is being cured by this filing within the fourteen-day cure period specified by the Bureau.

4.2 Remedial Measures Taken

Following the December 10, 2025 deficiency notice, Innovative Tech Pros, Corp. has taken the following remedial measures:

Designated the President, Caesar Engroba, as the senior officer personally accountable for RMD compliance, reporting, and recertification.

Established a calendar control to ensure the annual March 1 recertification required by 47 CFR § 64.6305(h) is completed without exception, and to ensure any change to CORES-resident information is reflected in CORES within ten (10) business days as required by the FCC's January 8, 2025 Report and Order (FCC 24-135).

Conducted a full review of Innovative Tech Pros, Corp.'s existing robocall mitigation controls and reduced them to the documented procedures set forth in Section 3 of this revised Plan.

Implemented a documented quarterly self-audit of RMD filing accuracy, with results retained in Innovative Tech Pros, Corp.'s compliance file for a minimum of three years.

4.3 No Other Actions or Investigations

Other than the matter described in Section 4.1, neither Innovative Tech Pros, Corp. nor any affiliated entity has been subject to any action or investigation by the Commission or any other law enforcement agency in the prior two years due to suspected involvement with illegal robocalling or spoofing.

5. Compliance Statement

Innovative Tech Pros, Corp. certifies under penalty of perjury that this mitigation program is true and correct and that Innovative Tech Pros, Corp. maintains ongoing compliance with 47 CFR § 64.6305. Innovative Tech Pros, Corp. further certifies that all calls it originates on its network are subject to the robocall mitigation program described in this Plan; that Innovative Tech Pros, Corp. has fully implemented STIR/SHAKEN on the Internet Protocol portions of its network; and that Innovative Tech Pros, Corp. commits to respond fully to all traceback requests within twenty-four (24) hours.

Signed:

Caesar Engroba

President, Innovative Tech Pros, Corp.

Date: December 10, 2025