

EarthWing Ventures Inc - Robocall Mitigation Plan

DBA "EarthWing"

Updated February 26, 2026

1. Introduction

This document outlines EarthWings comprehensive plan to mitigate the impact of illegal robocalls on our network. We are committed to adhering to all applicable regulations and best practices to minimize unwanted calls and protect our customers from fraud and harassment. This plan will be regularly reviewed and updated to ensure its effectiveness in addressing the evolving robocall landscape.

This robocall mitigation plan is for EarthWing Ventures Inc dba EarthWing located at 2511 Fawn Bluff Ct Zionsville IN 46077

EarthWing is not a foreign voice service provider.

2. STIR/SHAKEN Implementation

EarthWing is fully compliant with the FCC's STIR/SHAKEN framework for call authentication and routing.

Our softswitch generates and validates SSL based digital signatures for originating calls on our network, analyze call attestation data to identify and block calls with invalid or suspicious signatures, route calls with valid signatures with higher priority to enhance call delivery for legitimate callers.

We have implemented a STIR/SHAKEN solution supplied by BiCom Systems Incorporated and Telonium as the CA for SSL signing of voice traffic. Both are subject to change due during the filing period due to regulatory or digital validation requirements.

3. Know Your Customer/ Know Your Upstream Providers

3.1 Know Your Customer: EarthWing has a comprehensive vetting and review process for all new customers. Clients are generally small to medium sizes business and government agencies. We verify business name, address, and contact information. In addition, we verify legal structure, federal employer identification number, business description and services offered, authorized representatives and their contact information, and intended use of voice services.

We periodically review customer accounts and usage patterns to identify potential red flags. We investigate complaints related to robocalls originating from EarthWing

3.2 Know Your Upstream Providers: We have specific provisions in our contracts with upstream providers that require them to implement robust anti-robocall measures. We require them to mandate their cooperation in investigations of suspected illegal robocall traffic. If we find an upstream provider sending suspicious calls, we will terminate service in cases of non-compliance with anti-robocall regulations.

4. Compliance History

EarthWing has consistently adhered to all applicable Federal Communications Commission (FCC) rules and regulations pertaining to robocalls, including those related to the Telephone Consumer Protection Act (TCPA) and the Truth in Caller ID Act. In the past two years EarthWing has not been subject of a formal commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing with transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing.

No prior RMD certification has been removed by the Commission. EarthWing has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

The person within the Company responsible for addressing all robocall mitigation-related issues is:

Name: Lakshan Salgado

Title: President

Telephone Number: (317) 951-0999x 103

Email Address: LSalgado@EarthWing.net

5. Traceback

EarthWing will respond within 24 hours to all traceback investigations initiated by the Federal Communications Commission (FCC), law enforcement, or the registered traceback consortium. We maintain detailed call records that include timestamps, originating and terminating numbers, call duration, and other relevant data. These records are crucial for identifying the source and path of suspected illegal robocalls. Our upstream providers also hold traceback data for 24 hours for investigation.

The person within the Company responsible for addressing all traceback-related issues is:

Name: Lakshan Salgado

Title: President

Telephone Number: (317) 951-0999x 103

Email Address: LSalgado@EarthWing.net