

ROBOCALL MITIGATION PROGRAM AND POLICY

Entity Name: Clear Choice Technology Services, LLC

Doing Business As (DBA): Clear Choice Cloud Services

FCC Registration Number (FRN): 0025312125

Primary Contact: James Olds, President

Contact Address: 12650 N Beach St, Suite 114-72, Fort Worth, TX 76244

Contact Email: james@clearchoicetech.net

Contact Telephone: (817) 993-9972

1. Statement of Purpose

Clear Choice Technology Services, LLC ("Company") is committed to preventing the origination, transmission, and facilitation of illegal robocalls and fraudulent voice traffic across its network. This Robocall Mitigation Program ("RMP") sets forth the procedures, technical controls, and operational policies implemented by the Company in compliance with the rules and regulations of the Federal Communications Commission (FCC) under 47 C.F.R. § 64.6305.

2. Implementation of STIR/SHAKEN

The Company operates primarily as a reseller of IP voice services and utilizes underlying wholesale telecommunications partners (including BulkVS) to route originating and terminating voice traffic.

- **Signing Authority:** The Company relies on its licensed upstream wholesale providers to perform STIR/SHAKEN call authentication and digital signing pursuant to 47 C.F.R. § 64.6301 on the Company's behalf.
- **Attestation:** Upstream carriers authenticate outbound traffic generated by Company subscribers using appropriate attestation levels (Level A or B) based on verified number ownership and subscriber identity.

3. Know Your Customer (KYC) Procedures

The Company maintains strict Know Your Customer ("KYC") policies prior to provisioning outbound voice services or assigning telephone numbers to any enterprise or end-user subscriber:

- **Identity Verification:** All potential clients must provide verified corporate documentation (e.g., Tax ID/EIN, business formation documents, physical office address, and authorized corporate officer contact information).
- **Number Ownership Verification:** Before a customer is permitted to display a specific Caller ID number (ANI) on outbound calls, the Company verifies that the customer either owns, has ported, or holds an explicit Right-of-Use (ROU) authorization for that specific telephone number.
- **Prohibition of High-Risk Accounts:** The Company strictly prohibits anonymous sign-ups, unverified prepaid account creation, and open SIP trunk access to unauthenticated third parties.

4. Technical Monitoring and Traffic Analysis

The Company actively monitors voice traffic patterns across its customer base to detect and mitigate anomalous, high-risk, or illegal calling behavior:

- **Call Detail Record (CDR) Audits:** Automated software systems continuously analyze Call Detail Records (CDRs) for red-flag indicators associated with illegal robocalls, including:
 - High call volumes with short call durations (e.g., under 6 seconds).
 - High call completion failure rates or invalid destination routing.
 - Rapid sequential dialing or automated burst traffic pattern spikes.
 - Use of unassigned, invalid, or spoofed Caller ID numbers.
- **Immediate Mitigation:** If suspicious or non-compliant traffic patterns are detected, the Company reserves the immediate right to suspend outbound routing for the affected account, flag the traffic for manual review, or terminate service to prevent further transmission.

5. 24-Hour Traceback Commitment

The Company fully commits to cooperating with the FCC, federal and state law enforcement agencies, and the Official Industry Traceback Consortium (ITCB) in investigating and halting illegal robocall campaigns:

- **Dedicated Traceback Contact:** James Olds (james@clearchoicetech.net / 817-993-9972) is designated as the primary point of contact for all traceback requests.
- **24-Hour Response Guarantee:** The Company commits to acknowledging and responding fully to all legitimate traceback requests within **24 hours** of receipt.
- **Traceback Capabilities:** The Company maintains comprehensive CDR logging for at least 60 days to rapidly identify the source, upstream provider, and originating subscriber of any flagged call.

6. Enforcement and Account Termination Policy

The Company strictly enforces a zero-tolerance policy for illegal robocalling, fraudulent spoofing, or deceptive caller identification practices:

- Any subscriber found to be originating illegal robocalls, engaging in fraudulent spoofing, or violating the terms of this Robocall Mitigation Program will have their service **immediately suspended or permanently terminated** without prior notice.
- The Company reserves the right to report non-compliant subscribers and illegal calling activities to the appropriate regulatory and law enforcement authorities.

Certification Statement

I certify under penalty of perjury that I am an officer of Clear Choice Technology Services, LLC, that I have reviewed the foregoing Robocall Mitigation Program, and that the information contained herein is true, accurate, and complete.

Executed By:

James Olds

President, Clear Choice Technology Services, LLC

Date: October 2, 2026