

Serius Network, LLC

Robocall Mitigation Plan

Updated March 1, 2026

This edition preserves the original RMP content and adds a clearly marked March 1, 2026 update at the front so the document reflects current compliance posture and recent mitigation enhancements.

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Document Note	Original RMP content retained and supplemented with March 1, 2026 updates

Notice of Update: The March 1, 2026 section below is presented first so reviewers can immediately see the current additions. The original RMP narrative follows in full as the main body of the document.

March 1, 2026 Update Summary

Serius Network, LLC has updated its Robocall Mitigation Plan to reflect evolving FCC expectations, traceback-related operating realities, and current carrier compliance standards. These updates supplement the company's existing mitigation practices and are intended to improve prevention, early detection, investigation, and enforcement.

1. Enhanced Customer Verification and KYC

Serius Network, LLC has strengthened its Know Your Customer procedures to further reduce the risk of unlawful robocall traffic entering the network. This includes deeper review of legal business registration, business purpose, authorized representatives, anticipated traffic profile, and caller identity usage rights before significant traffic is enabled.

2. Campaign Registration and Traffic Disclosure

Customers generating outbound campaigns may be required to disclose campaign purpose, expected call volume, calling windows, and consent acquisition methods. This allows Serius Network, LLC to compare represented use cases against actual traffic behavior and investigate unusual deviations more efficiently.

3. Do-Not-Call Compliance Enforcement

Customers are required to scrub outbound dialing lists against the Federal Do-Not-Call Registry and applicable state registries before initiating campaigns. Serius Network, LLC reserves the right to request documentation supporting DNC compliance and may suspend traffic that presents DNC-related risk signals or complaint indicators.

4. DID Reputation Monitoring

Newly provisioned and actively used telephone numbers may be reviewed for reputation indicators, complaint trends, or spam-related signals. This helps identify number-level risk before it materially affects the network or interconnection relationships.

5. Spam Label Monitoring

Serius Network, LLC actively monitors caller reputation and spam-label trends through available analytics and complaint-related signals. When numbers show elevated risk indicators, traffic may be reviewed, throttled, or suspended while the matter is investigated.

6. Traffic Pattern and Anomaly Detection

The company has expanded daily and recurring traffic monitoring practices to detect abnormal patterns such as sudden dialing spikes, high short-duration ratios, repeated attempts to the same numbers, abnormal completion or failure rates, and other signals commonly associated with unlawful robocalling behavior.

7. Traceback Escalation Procedures

Traceback requests continue to be reviewed promptly, and Serius Network, LLC strives to respond within 24 hours whenever reasonably possible. If illegal robocall activity is suspected, traffic may be suspended pending investigation, and customers may be required to provide supporting information concerning calling purpose, consent, or number rights.

8. Compliance Monitoring

Serius Network, LLC will continue to perform ongoing compliance monitoring and refine its mitigation procedures in response to FCC requirements, carrier expectations, traceback experience, and new fraud patterns. This monitoring includes recurring review of customer activity, traffic behavior, complaint signals, and operational controls so that the Plan remains current and operationally meaningful rather than static.

Original Robocall Mitigation Plan

In line with the obligatory outline of 47 C.F.R. Section 64.6305, Serius Network, LLC submits this Robocall Mitigation Plan. As a provider of voice services, the company is dedicated to developing and implementing techniques designed to minimize unlawful robocalls originating from or passing through its network.

A. Certifying Call Credibility

Serius Network, LLC has adopted call trustworthiness methodologies such as the SHAKEN/STIR framework to help ascertain the legitimacy of calls initiated on its network and to impair the ability of illicit robocallers to spoof caller ID information.

B. Active Survey and Study of Calls

The company perpetually supervises and scrutinizes call movement across its network using analytical tools that help identify irregularities and patterns related to robocalls so that action can be taken swiftly.

C. Preventive Traffic Filtration and Obstruction

Serius Network, LLC applies traffic filtration and blocking tools as part of its approach to curb illegal robocalls. These tools are improved over time based on industry trends, operational experience, and insight acquired through network inspection.

D. Enhancing Consumer Awareness and Vigilance

The company seeks to educate consumers about the risks and repercussions of robocalls and uses communication channels to keep customers informed about preventative measures and methods of reporting unusual activity.

E. Engagement and Alliance

Serius Network, LLC remains committed to partnering with industry participants, including the FCC, law enforcement authorities, and organizations such as the Industry Traceback Group. The company pledges to address traceback inquiries within 24 hours and to participate in investigations aimed at identifying and terminating illegal robocallers utilizing its services.

Through deployment of these tactics, Serius Network, LLC reasserts its commitment to combat unwarranted robocalls and defend against fraudulent calls. Ongoing appraisal and improvement of these strategies are intended to keep pace with evolving robocall practices.

Conformance to STIR-SHAKEN Model

As reflected in the FCC Robocall Mitigation Database, Serius Network, LLC has implemented the STIR-SHAKEN authentication system within its network. Calls originating from the network are intended to comply with the applicable requirements of 47 CFR Section 64.6301(a)(1) and (2), and the company has developed procedures under this Robocall Mitigation Plan to deter the use of its services for illegitimate robocalls.

Handling Traceback Requests

Serius Network, LLC affirms its dedication to collaborating with the FCC, law enforcement entities, and the Industry Traceback Group in combatting illicit robocall activity. This includes responding promptly to traceback requests and investigations and dedicating sufficient resources to provide complete responses within reasonable time frames.

The company pledges to address traceback requests within 24 hours of receiving them whenever reasonably possible.

Bolstering Countermeasures

To augment the effective tracing of unsolicited robocalls, specific provisions may be included in carrier interconnection or service agreements. These provisions require cooperation in tracing the source path of voice service calls, promptly identifying upstream providers that injected suspected illegal robocalls into a network, or pinpointing the original source where possible.

This contractual approach is intended to foster elevated responsibility and stronger cooperation in combatting illegal robocall activities.

Customer Verification Practices

To curtail or minimize illegal robocalls deriving from its voice services, Serius Network, LLC executes customer verification practices designed to validate the identity of voice service subscribers and support legitimate business relationships.

The subscriber vetting process encompasses customer service requests, service agreement execution, and allocation of telephone resources. During this process, key customer information is collected to verify customer identity and assess suitability for the requested services.

Commercial end users, especially larger business entities with complex service structures, may present elevated risk and therefore may be subject to additional scrutiny, including comprehensive background checks or site liaison where appropriate.

Serius Network, LLC acknowledges the importance of stringent vetting for wholesale customers. As required, identity information of wholesale customers may be re-verified using FCC Form 499-A filer information or the FCC Intermediate Provider Registry.

Monitoring, CDR Review, and Early Detection

Serius Network, LLC has established a structured process for overseeing usage and quality across its network facilities. Regular and punctual reviews of call detail records facilitate early detection of unusual or suspicious calling patterns that may represent illegal robocalls initiated through the network.

If activity or a pattern consistent with illegal robocalls is identified, the customer may be contacted within 24 hours for further scrutiny and potential action concerning subscribed voice services.

A. Validating Telephone Numbers

This process refers to validating the customer's or end user's right to employ a specific telephone number related to subscribed voice services. Serius Network, LLC has adopted industry practices and implemented strategies to verify the right of a customer to use a specific number.

If a subscriber's number is managed directly by Serius Network, LLC or obtained through an underlying partner, it may be used as that subscriber's caller identity. For both single-line subscribers and those with multi-line telephone systems, the company only allows call connection where the originating number matches one of the numbers assigned to the subscriber. This automated and secure method helps validate originating telephone numbers.

B. International Call Originators

At the time of the original filing, Serius Network, LLC did not provide international voice services and had no plans to expand services in that direction.

C. Know Your Customer

Sales, product management, and business operations teams assess the type of traffic the customer intends to send and the types of end users they serve. Detailed information such as the customer's legal business name, business address, contact details, and tax or other regulatory identification is required and reviewed by the finance team.

Through this Know Your Customer approach, Serius Network, LLC conducts due diligence on immediate upstream customers as part of its broader robocall mitigation efforts.

Continuous Robocall Mitigation Efforts

The provider monitors the usage of its network and scrutinizes call detail records regularly to detect suspicious call activities and patterns. When usage patterns consistent with illegal robocalls are detected or suspected, the party originating, terminating, or routing these calls is promptly identified so that appropriate action may be taken.

Original Prior Update Note - 08/01/2024

Serius Network previously announced the implementation of new compliance measures aimed at combating unwanted and unlawful robocalls, including an in-house fraud detection system to detect robocalling and a more robust KYC form designed to capture more data from upstream carriers and traffic profiles.

According to that prior update, those measures had materially reduced traceback activity and were also intended to support more organic, compliant business growth rather than onboarding traffic solely for revenue.

Authorized Certification

I certify, on behalf of Serius Network, LLC, that this Robocall Mitigation Plan includes the original plan content together with the March 1, 2026 update presented at the front of this document, and that the company remains committed to compliance with applicable robocall mitigation obligations and industry standards.

Jacob Tanner

Jacob Tanner

CEO/Owner

Serius Network, LLC

Date: March 1, 2026