

February 26, 2025

To Whom It May Concern:

Private Tech Inc. (Private Tech) submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the Federal Communications Commission's ("Commission's" or "FCC's") rules.

Private Tech is a voice service provider and has complete STIR/SHAKEN implementation utilizing its own SPC token and certificate to authenticate all SIP-based traffic originating from its network. To execute the technical act of signing calls, Private Tech utilizes a hosted authentication solution where its private keys and certificates are managed by its primary intermediate provider according to Private Tech's attestation policies.

Inteliquent, Inc. d/b/a Sinch America Inc. ("Sinch") is Private Tech's Primary Intermediate and Gateway Provider. Sinch has certified that it has "Complete STIR/SHAKEN" implementation.

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. Private Tech reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Private Tech and its principals and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

Private Tech has not been prohibited from filing in the Robocall Mitigation Database.

[Traceback](#)

Private Tech commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Private Tech will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

I, Eric Powell, submit this certification on behalf of Private Tech, LLC, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database.

Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.

Signed by:

776ABE355CB6484...

Signature

2/26/2026

Date

Identifying and Other Information

- Other business names in use: Cape
- All business names previously used: East Stout
- Private Tech is not a foreign voice service provider.
- Affiliates: N/A
- Subsidiaries: Cape Japan KK, Cape Taiwan Company Limited, Cape Wireless Mexico
- Parent Company: N/A
- OCN: 004L
- Person within company responsible for addressing robocall mitigation-related issues: Eric Powell

Robocall Mitigation Plan

Private Tech Inc. operates as a Full MVNO utilizing a proprietary Mavenir core. Private Tech has full STIR/SHAKEN implementation, utilizing its own SPC token and certificate to authenticate and sign all SIP-based traffic originating from its Mavenir core. To execute the technical act of signing calls, Private Tech utilizes a hosted authentication solution where its private keys and certificates are managed by its primary intermediate provider according to Private Tech's attestation policies.

Reasonable Steps

This section outlines the specific reasonable steps Private Tech has taken to ensure that the Company is not a conduit for illegal robocall traffic.

Private Tech's procedures, policies, and safeguards protect against robocalls at every stage of a subscriber's life cycle.

First, the network is designed to be unappealing to robocallers due to the Company's focus on single-line accounts and lack of SIP trunking.

Additionally, Private Tech leverages advanced platforms to identify fraudsters upfront, including multiple levels of checks against massive credit datasets.

Enterprise customers are subject to further checks because of their increased risk profile. Specifically, enterprise subscribers provide their legal business name, place of formation, proof of good standing, FEIN, business address, active telephone number, type of goods or services offered, and supporting records confirming the same. Private Tech further requires enterprise customers to provide the name of the authorized individual acting on behalf of the customer, confirmation of that authority, and confirmation that they have not been the subject of an adverse final determination for violating state laws, federal laws, or FCC rules pertaining to robocalls.

Sinch the Company's primary intermediate and gateway provider, provides continuous network monitoring. In its robocall mitigation plan, Sinch states that it deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio ("ASR") and call count carrier/consumer reports. Sinch has a "Know Your Customer Team" which conducts "know your upstream provider" vetting before it allows a party to become a new customer. Sinch states that it uses network tools including a Randomizer (which is used for customer traffic sent to it via a least cost routing engine), Automatic Number Identification Management, and Proactive Blocking. Sinch

states that it blocks calls that originate from invalid, unallocated or unused numbers, as well as numbers on Do-Not-Originate lists.

Private Tech has the technical ability to identify IMEIs generating problematic activity and the technical ability to suspend that IMEI. In the Company's Terms and Conditions, Private Tech prohibits the use of Company services in any way that violates federal, state, or local laws or that promotes illegal activity. The Terms further reserve Private Tech's sole discretion to "terminate the Subscriber's use of the Company's Services at any time."

Private Tech will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

Upstream Providers

This section outlines the affirmative steps taken to ensure that our upstream providers do not serve as a conduit for illegal robocall traffic. Our primary upstream relationship for PSTN interconnection, voice termination, and SMS aggregation is via Sinch.

Private Tech verifies that Sinch maintains an "Active" and compliant status in the FCC Robocall Mitigation Database. Private Tech has further reviewed Sinch's regulatory history to ensure that the company has not been the subject of an FCC "Initial Determination Order" or "Final Determination Order" regarding illegal traffic.

In its Robocall Mitigation Plan, Sinch states that it has a "Know Your Customer Team" that conducts "know your customer" and "know your upstream provider" vetting before it allows a party to become a new customer.