

Robocall Mitigation Program Description

Company Name: SaraMana Business Products

DBA: SaraMana Business Solutions

FRN: 0031027329

Date: February 20, 2026

Introduction and Commitment

SaraMana Business Products, also doing business as SaraMana Business Solutions ("the Company"), is fully committed to preventing illegal robocalls and spoofed calls on its network. In compliance with the TRACED Act and Federal Communications Commission (FCC) regulations, the Company has implemented a comprehensive Robocall Mitigation Program. This policy outlines the Company's practices and obligations, which meet or exceed current FCC rules, including full STIR/SHAKEN implementation, active cooperation with industry traceback efforts, prompt blocking of unlawful traffic, rigorous vetting of customers and upstream partners, advanced analytics for call monitoring, transparency measures for call blocking, and robust internal compliance oversight.

1. Caller ID Authentication (STIR/SHAKEN) Implementation

The Company has fully implemented STIR/SHAKEN in the IP portions of its network. All outbound calls originating on the Company's network are authenticated with secure STIR/SHAKEN digital signatures, and the Company verifies incoming calls for authentic caller ID information. By using the STIR/SHAKEN framework, the Company ensures the integrity of caller identification to combat illegally spoofed calls and complies with the TRACED Act's call authentication mandate.

2. Traceback & Law Enforcement Cooperation

The Company fully cooperates with FCC enforcement efforts, the Industry Traceback Group (ITG), and law enforcement. All traceback requests are answered within 24 hours of receipt. SaraMana maintains dedicated contacts and processes to expedite investigations, identifying the source of suspect traffic and taking appropriate remedial action immediately.

3. Call Traffic Blocking & Mitigation Measures

- **Blocking on FCC Notification:** Upon written notification by the FCC's Enforcement Bureau of illegal traffic, the Company immediately blocks said traffic and notifies the Commission of actions taken.

- **Proactive Mitigation:** The Company reserves the right to block traffic from any source if robocall abuse or unauthorized caller ID information is detected.
 - **Emergency Services:** The Company does not block 911 or other emergency service numbers.
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4. Know Your Customer (KYC) Program

In accordance with 47 CFR § 64.1200(n)(4), the Company takes affirmative measures to vet customers:

- **Identity Verification:** New customers must provide valid government ID and business credentials verified via independent sources.
 - **Background Screening:** High-volume callers are subject to enhanced due diligence and intended-use evaluations.
 - **Service Limits:** New accounts are subject to conservative traffic caps until legitimate calling practices are verified.
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5. Know Your Upstream Provider (KYUP) Program

- **RMD Verification:** The Company only accepts traffic from providers registered in the FCC's Robocall Mitigation Database.
 - **Contractual Commitments:** Interconnection agreements require upstream partners to implement STIR/SHAKEN and comply with 24-hour traceback requirements.
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6. Network Monitoring, Analytics & Do-Not-Originate (DNO)

The Company utilizes advanced analytics to detect anomalies such as unusually short call durations, low answer/seizure ratios, and neighbor spoofing. The Company also maintains automated blocking of numbers on DNO lists, including invalid, unallocated, and inbound-only numbers.

7. Transparency & Redress for Call Blocking

- **Notification:** Blocked calls receive appropriate SIP response codes (e.g., 603 or 607) to inform the caller.
- **Point of Contact:** The Company maintains a publicly accessible point of contact at itadmin@saramana.com to address call blocking disputes or inquiries. Credible reports of errors are investigated and resolved within 24 hours.

8. Compliance Oversight & Documentation

The Company has designated a Robocall Compliance Officer to oversee daily operations and annual internal audits. SaraMana maintains its certification in the FCC's Robocall Mitigation Database and will update this plan within 10 business days of any significant changes.