



Bray-Pey Holdings LLC d.b.a. Maine Technology Group

15 Evergreen Drive
Oakland, ME 04963

Robocall Mitigation Plan

Bray-Pey Holdings LLC d.b.a. Maine Technology Group ("Maine Technology Group") is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and its territories.

Maine Technology Group is a voice service provider reselling hosted VoIP services. Pursuant to 47 CFR § 64.6305 (d), as a reseller, Maine Technology Group lacks control over the infrastructure necessary to implement STIR/SHAKEN and relies on the completed implementation from our upstream providers.

Maine Technology Group is not an international voice service provider.

Maine Technology Group has not had any prior certification removed and has not been prohibited from filing in the Robocall Mitigation Database.

Maine Technology Group nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Principal Contact Information

Name: Jon Perkins

Title: Owner

Address: 15 Evergreen Dr, Oakland, ME 04963

Phone: 207-692-0955

Email: jon@mainetechgroup.com

Maine Technology Group has implemented a robocall mitigation program including the following reasonable steps to avoid originating illegal robocall traffic:

New and Renewing Customers

Maine Technology Group resells voice services primarily to small business retail end-users. New customers are vetted through in-person meetings and business location visits. We collect and maintain physical customer addresses, contact person(s), and related business information. All customers are required to sign and adhere to a master service agreement that includes our call abuse policy:

Maine Technology Group reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. Maine Technology Group is able to block the originating number(s), terminating numbers(s), trunk(s), or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting our managed networks.

Know your Upstream Provider

Maine Technology Group maintains a reseller relationship with two upstream providers who provide a hosted VoIP platform and services. These upstream providers also receive voice traffic originating from our customers:

PayG LLC dba SkySwitch

Arborcrest 1, 751 Arbor Way
Suite 150 Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com

CoreDial LLC

Arborcrest 1, 751 Arbor Way
Suite 150 Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com

These upstream providers have valid registrations in the Robocall Mitigation Database. They control and maintain the infrastructure necessary for, and have fully implemented, the STIR/SHAKEN protocols on which Maine Technology Group's services rely.

Analytics

Maine Technology Group utilizes the software and services provided by our upstream providers, PayG LLC dba SkySwitch and Coredial LLC, to monitor for suspicious traffic. Maine Technology Group works closely with our upstream providers and responds swiftly to help address any detections.

The software and services provided by PayG LLC dba SkySwitch and Coredial LLC monitor outbound voice traffic in real-time to prevent the origination of illegal robocalls. Their solution features:

- Monitoring the network for suspicious traffic patterns.
- Limiting capacity via call per second and/or concurrent session limits.
- Authenticating and verifying Caller IDs.
- Supporting accurate call blocking as per the TRACED Act (2019).
- Checking for Do Not Originate (DNO) numbers.

Traceback Requests

Maine Technology Group commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. We shall cooperate with these groups to investigate and stop any illegal robocallers from using our service to carry or process illegal calls. When notified by the FCC's Enforcement Bureau, we shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless our investigation determines that the traffic is not illegal) when we receive actual written notice of such traffic from the Enforcement Bureau. If Maine Technology Group determines that the identified traffic is not illegal, we shall provide the Enforcement Bureau with an explanation as to why we reasonably concluded that the identified traffic is not illegal, and what steps we took to reach that conclusion.

Traceback Contact

Name: Seth Rogers

Phone: 207-692-0955

Email: abuse@mainetechgroup.com