

STARLANER COMMUNICATIONS LLC

ROBOCALL MITIGATION PLAN

STARLANER COMMUNICATIONS LLC is committed to cooperating with the Federal Communications Commission (FCC) in preventing and mitigating illegal robocalls. This statement describes the measures the Company has implemented to comply with applicable FCC robocall mitigation requirements.

STARLANER COMMUNICATIONS LLC operates as an intermediate provider under process to obtain Operating Company Number (OCN) and complies with the robocall mitigation requirements of the FCC pursuant to 47 C.F.R. §§64.6303 and 64.6305, including STIR/SHAKEN authentication and traceback obligations as reflected in the FCC Robocall Mitigation Database filing requirements.

The Company transmits and routes voice traffic between originating and terminating providers and, in certain instances, originates outbound voice traffic over its IP network. The Company maintains direct control over outbound caller identification information, call routing policies, trunk provisioning, and traffic management decisions.

Know Your Customer (KYC)

The Company follows a structured onboarding process to verify the identity and legitimacy of its customers. This process includes background screening, credit review, business verification, and manual validation procedures prior to activating service.

Traceback Cooperation

The Company commits to fully cooperating with the FCC, authorized traceback consortiums, and law enforcement agencies. The Company responds to all traceback requests within 24 hours and takes appropriate action to investigate and mitigate any suspected illegal traffic.

STIR/SHAKEN Compliance

The Company implements partial STIR/SHAKEN authentication in the IP portions of its network and

maintains its third-party Service Provider Code (SPC) token and associated digital certificate. The Company signs outbound calls using its third-party SPC credentials and retains full regulatory responsibility for certificate management, private key security, and attestation level assignment.

Traffic Monitoring and Enforcement

The Company reserves the right to refuse or block traffic from any party where illegal robocalling, spoofing, or use of unauthorized or invalid originating numbers is detected or suspected. The Company may block originating numbers, terminating numbers, trunks, or suspend or terminate customer accounts to prevent unlawful traffic from transiting its network.

Knowledge of Upstream Providers

All Starlaner Communications' VOIP calls are routed through our trusted network of upstream providers, comprising Telnyx, Commio, VOIP Innovations, and Bandwidth.com. These esteemed wholesale service providers are duly registered in the FCC's Robocall Mitigation Database, ensuring their commitment to upholding Regulatory standards.

Each of our upstream providers maintains connections with multiple Tier-1 service providers, all of whom adhere to FCC guidelines and possess robust mechanisms for identifying and blocking illicit robocall activity.

Under comprehensive master service agreements, Starlaner Communications has received explicit assurances from our upstream providers' leadership, affirming their adherence to FCC's STIR/SHAKEN protocols and robust robocall mitigation measures. These agreements underscore our collective commitment to combating illegal robocalls and ensuring compliance with regulatory frameworks.

Furthermore, Starlaner Communications and our upstream providers have pledged to collaborate closely in mitigating unlawful robocall instances, including prompt Cooperation in responding to traceback requests. Our shared dedication to maintaining the integrity of voice services underscores our proactive stance against illegals robocall activity.

Signed

Anitha Chintakayala

Anitha Chintakayala,

Chief Operating Officer

Starlaner Communications LLC

Address: 1207 Delaware Ave #711, Wilmington, DE 19806-4743

Phone: (302) 802-0010,

Email: support@starlaner.com