

Robocall Mitigation Program

Table of Contents

I. Purpose of This Program.....	2
II. Definitions.....	2
III. Statement of Policy and Designations.....	3
IV. General Policies for Robocall Mitigation.....	4
A. Requirements of Company to Mitigate Illegal Robocalls.....	4
B. Legal vs. Illegal Robocalls.....	4
V. Procedures for Robocall Mitigation.....	5
A. Contact.....	5
B. Traceback.....	5
C. Subscriber Vetting – New and Renewing Customers.....	7
D. Service Agreements – New and Renewing Customers.....	7
E. Know-Your-Upstream-Provider.....	7
F. Telephone Number Validation.....	8
G. Network Capacity Limitations.....	8
H. Network Monitoring Call Analytics.....	8
I. Call Analytics/XDR/SIEM Services.....	8
J. International Call Originators.....	8
K. Certification and Contact Updates.....	9
L. Disclosure of Past Investigations.....	9
VI. Attestation.....	9

I. Purpose of This Program

Jea Holdings, LLC has established this Robocall Mitigation Program (RMP) to implement best practices, procedures, and policies to mitigate or reduce the origination of illegal robocalls. This program is designed to comply with the FCC regulations and to ensure that all necessary steps are taken to prevent unlawful robocalling activities on our network.

II. Definitions

Customer: A service provider's subscriber, which may or may not be the ultimate End User of the telecommunications service.

End User: The entity ultimately consuming the telecommunications service, including the End User's device used for placing the call.

Foreign Voice Service Provider: Any entity providing voice service outside the United States that can originate or terminate voice service that crosses international borders.

Industry Traceback Consortium: The consortium that conducts private-led efforts to trace back the origin of suspected unlawful robocalls as selected by the FCC.

Robocall Mitigation Database: A database accessible via the FCC's website that lists all entities that make filings pursuant to §64.6305(b).

Telecommunications Carrier: A person or entity that meets the definition of 47 U.S.C. 1001(8), including a person or entity that the FCC finds is a replacement for a substantial portion of the local telephone exchange service under 47 U.S.C. § 1008(B)(ii).

Voice Service: Any service interconnected with the public switched telephone network that furnishes voice communications to an end user using resources from the North American Numbering Plan (NANP) or any successor to the NANP adopted by the FCC under section 251(e)(1) of the Communications Act of 1934, as amended.

III. Statement of Policy and Designations

It is the policy of Jea Holdings, LLC to comply with all applicable federal regulations, including the TRACED Act, which mandates voice service providers to implement robocall mitigation strategies. These strategies include the deployment of STIR/SHAKEN caller ID authentication technology in the IP portions of our network and the development of non-IP caller ID authentication solutions.

The FCC has issued orders requiring all voice service providers to file certifications and Robocall Mitigation Programs with the Robocall Mitigation Database. These regulations demand that voice service providers:

1. Detail the “reasonable steps” they are taking to avoid originating illegal robocalls;
2. Outline procedures for “new and renewing customers”;
3. Provide processes to “know your upstream provider”;
4. Identify call analytics systems used to block illegal traffic;
5. Commit to responding to traceback requests within 24 hours
6. File the Robocall Mitigation Program with the FCC’s database.

All officers, employees, or agents of Jea Holdings, LLC are required to follow the policies and procedures specified in this program.

IV. General Policies for Robocall Mitigation

A. Requirements of Company to Mitigate Illegal Robocalls

All officers, employees, and agents of Jea Holdings, LLC understand and agree to follow applicable federal and state laws, court orders, FCC regulations, and company policies to mitigate illegal robocalls.

B. Legal vs. Illegal Robocalls

Voice Service Providers are required to take reasonable steps to avoid originating illegal robocall traffic, as defined within the Telephone Consumer Protection Act (TCPA).

- **Legal Robocalls:** Calls to landlines for non-telemarketing purposes, calls with prior consent, and emergency calls.
- **Illegal Robocalls:** Calls to landlines or wireless phones that leave a pre-recorded or artificial voice message for telemarketing purposes without prior consent.

Jea Holdings, LLC implements policies and procedures to minimize the risk of illegal calls and provides mechanisms for customers to dispute incorrect flagging of legitimate calls.

V. Procedures for Robocall Mitigation

A. Contact

Pursuant to 47 CFR 64.6305(B)(4), Jea Holdings, LLC has designated a point of contact to receive notice of any incidents of illegal robocall traffic. This Point of Contact is named in the Robocall Mitigation Database.

B. Traceback

Jea Holdings, LLC commits to responding within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Consortium. Upon notification of an illegal robocall originating from the network, the company will:

1. Review call information to determine if the call originated from our network.
2. If identified as our customer, appropriate actions will be taken, including possible service restrictions or termination after repeated violations.

When Company receives a notification of an illegal robocall originating from the Company's network, the following actions will be initiated:

1. Company personnel will review the call information to determine whether the call is from Company's network or one of its affiliates. If the call is from an entity other than Company, the notice will be forwarded on to that entity for review and any action or response.
2. If the call is from one of Company's customers in its network, Company personnel will attempt to identify the user. The following actions may be taken with offenders:
 - a) If the offender is an employee, the responsible supervisor will be notified, and appropriate disciplinary action may be warranted. A copy of the violation will be filed by HR in the employee's personnel file.
 - b) If the offender is a customer, the customer will be notified by telephone and email of the offense. If it is a first-time offense, the customer will be notified and advised that an alleged violation has been received and that any further violations could affect the customer's account. Notification of a second offense will result in the same action. A third offense will result in notice that the customer's service has been restricted for ninety (90) days to limit the ability to violate the law. A fourth offense will result in termination of service.

In addition to the above actions Company may take when it identifies a pattern consistent with illegal robocalls, Company may also initiate or cooperate in a traceback investigation to verify that the originating customer owns or is authorized to use a Caller ID number. In conjunction with following Industry Traceback Group-recommended best practices, Company has sufficient resources to promptly respond to traceback and trace forward investigations.

Upon receipt of notice from Company that an illegal robocall originated from customer's number, customer may dispute the determination.

1. If the customer's number has been inadvertently flagged as illegal robocalling due to third-party unauthorized spoofing of the customer's number, Company will make a good faith effort to contact database vendors in an attempt to correct the issue.
2. If the robocall was a legal robocall originating from the customer, the circumstances of the robocall will be reviewed with the customer and the customer will be monitored for a thirty (30) day period thereafter.

C. Subscriber Vetting – New and Renewing Customers

Jea Holdings, LLC has implemented a "know-your-customer" process to prevent illegal calls. The vetting process includes verifying the identity of business customers, confirming their physical location, contact information, and federal tax ID, especially for outbound call centers or high-volume services.

D. Service Agreements – New and Renewing Customers

The service terms outlined on our website prohibit deceptive practices, legal violations, or fraudulent activity. Jea Holdings, LLC reserves the right to suspend or terminate services for any violation of these terms.

E. Know-Your-Upstream-Provider

Jea Holdings, LLC monitors the status of upstream providers within the Robocall Mitigation Database. We do not accept traffic from carriers removed from the database and review their mitigation steps to ensure compliance.

F. Telephone Number Validation

Jea Holdings, LLC ensures that subscribers use only authorized telephone numbers. For multi-line telephone systems (MLTS), originating calls are validated against assigned numbers. Any unauthorized number usage requires prior authorization.

G. Network Capacity Limitations

Jea Holdings, LLC limits network capacity based on service needs to mitigate the risk of network flooding by illegitimate traffic. Subscriber-facing and PSTN-facing segments are appropriately sized to prevent unintended call origination.

H. Network Monitoring Call Analytics

Advanced monitoring tools are deployed to track and analyze call traffic. Alerts are generated for unusual patterns, and investigations are initiated if illegal activity is suspected. We utilize XDR/SIEM and other third-party services for detailed analysis when necessary.

I. Call Analytics/XDR/SIEM Services

Jea Holdings, LLC partners/host third-party call analytics/XDR/SIEM services/tools to monitor originating traffic. These services help identify potential illegal robocalls and follow internal policies to mitigate risks.

J. International Call Originators

While not currently serving as a Foreign Voice Service Provider, Jea Holdings, LLC will develop validation processes for international originators using North American Numbering Plan numbers if such services are provided.

K. Certification and Contact Updates

Jea Holdings, LLC commits to updating its certification, identification, and contact information with the FCC within 10 business days of any changes.

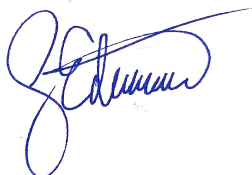
L. Disclosure of Past Investigations

- ☒ Jea Holdings, LLC has not been the subject of any formal action or investigation related to illegal robocalls or spoofing within the past two years.
- ☐ Jea Holdings, LLC has been the subject of the following action(s) or investigation(s):

Details: N/A

VI. Attestation

I, Josue Arguelles, MGMR/managing partner, hereby certify under penalty of perjury that the information provided in this certification is true and accurate to the best of my knowledge, and that Jea Holdings, LLC is in full compliance with the Robocall Mitigation requirements as specified by the FCC.





PO BOX 566539
Miami, FL 33256-6539
Email: info@jeaholding.com
PH: +1-305-307-8545

Josue Eduarte Arguelles
MGMR/Managing Partner