

Robocall Mitigation Program Description for STRFF NETWORK LLC

1. CONTRACT REQUIREMENT:

STRFF NETWORK LLC prohibits the origination of illegal robocalls through our network. Our agreements with customers explicitly define this prohibition, along with the consequences for violations, which may include immediate termination of service without notice. If illegal traffic is identified, we reserve the right to share relevant data with industry partners and law enforcement as required by regulatory authorities.

2. CUSTOMER DISCLOSURES AND CONFIRMATION:

All customers are required to provide detailed information about their business, including physical location, contact personnel, business formation details, and federal tax identification. STRFF NETWORK LLC conducts thorough investigations to verify this information and ensure transparency regarding the nature of the traffic originating from their services.

3. MONITORING AND TRACEBACK:

STRFF NETWORK LLC actively monitors network traffic for suspicious activity. We take prompt action when potential robocall activity is detected, ensuring that such traffic is pre-authorized as legal (e.g., political campaigns, non-profit calls, or fully opted-in communications). We respond immediately to traceback requests from authorities, requiring detailed explanations from involved customers and enforcing corrective actions as needed.

4. PUBLICATION AND NOTIFICATION:

This Robocall Mitigation Plan is published on our website, and we proactively notify all customers of these policies. We maintain records of these notifications to ensure compliance.

5. FOREIGN SOURCES OF TRAFFIC:

For customers outside the USA, we implement additional verification measures to ensure compliance with our Robocall Mitigation Plan. Prior to granting calling privileges to foreign customers, we verify all required information.

6. ROBOCALL MITIGATION DATABASE:

All wholesale customers must be registered with the Robocall Mitigation Database. Customers not registered will not be granted access to our network.

7. CALL BLOCKING:

STRFF NETWORK LLC actively blocks calls from numbers known to originate illegal robocall traffic. We implement call-blocking measures to protect our network and our customers from fraudulent activity.

8. LAW ENFORCEMENT COOPERATION:

STRFF NETWORK LLC fully cooperates with law enforcement, industry traceback groups, and the FCC. We have a designated contact person responsible for managing all traceback requests and coordinating with external investigations to ensure compliance and transparency.

Confidentiality Request: None.