

Robocall Mitigation Plan

Business Information

Technology Innovation Lab, LLC
326 Broad St.
Utica NY 13501

Contact Information

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Overview

In the Commission's recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Technology Innovation Lab, LLC ("Technology Innovation Lab"), is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. As certified in the FCC's Robocall Mitigation Database, Technology Innovation Lab has fully implemented STIR/SHAKEN. In compliance with the R&O, Technology Innovation Lab submits this RMP and certification.

Know Your Customer ("KYC")

Before any client is allowed to place outbound calls, we have them complete a Know Your Customer form, which tracks items as such IP, MNC for cell phones, and others. Once a client, our STIR/SHAKEN software checks the requesting and media IPs and will change the attestation level based on those parameters. If an international media IP is detected, we may update the attestation level to a C. We also have developed in-house tools to help provide a likelihood of suspicious traffic.

All new Technology Innovation Lab subscribers must provide:

1. Company name

2. Company address
3. Contact name
4. Telephone number
5. Incorporation date
6. EIN
7. IRS Notice CP 575
8. DBA
9. Web domain
10. Industry
11. Goods/services
12. 499a Filed ID
13. SAN number
14. A number of representations that the company would comply with U.S. laws

Subscribers putting money onto the Technology Innovation Lab platform ("platform"), a requirement in order to place outbound PSTN calls, must also provide their credit card number and associated information.

New subscribers have their outbound calls rate-limited to one per second, and human contact via phone call or in-person is required in order to increase that rate. New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones validated through automated-number-validation voice call. All pay-by-card subscribers have limits placed on the number of payments they may make per day and the size of those payments. Both are kept low unless we have had human contact with the customer via phone call or in-person. Pay-by-invoice is allowed only for subscribers who we know well, with human contact via phone call or in-person at the very least, and credit and associated checks having taken place.

We only accept Stripe for payments and use Stripe Radar to help mitigate fraud.

Technology Innovation Lab is a small company, we have a small number of customers. We know our customers and understand their use cases.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, Technology Innovation Lab provides the following information concerning its upstream voice service carrier.

Technology Innovation Lab has three upstream providers from which it receives voice traffic:

- 1) Inteliquent, Inc. DBA Onvoy, Sinch ("Inteliquent")
550 W. Adams St.
Suite 900
Chicago IL 60661
Heather Share
Email: heather.share@sinch.com
- 2) Skye Telecom LLC
PO Box 2445

Vancouver WA 98668
Joshua Riffle
noc@skyetel.com

- 3) VoIP Innovations, LLC
One Penn Center West
Suite 400
Pittsburgh PA 15276
Sebastian Kiely
Email: skiely@sangoma.com

Technology Innovation Lab and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Technology Innovation Lab maintains an AUP that subscribers must agree to before being permitted to use its software and services. Among other things, the AUP prohibits:

- using our service for any illegal purposes whatsoever;
- engaging in activity for which FCC or any equivalent national regulatory authority, has restricted or regulated in relation to proper use of the public telephony network or the Internet;
- using our service if Technology Innovation Lab determines, at its sole discretion, that its provision for this customer is prohibited by applicable law or has become impractical or unfeasible for any legal or regulatory reason; and
- using our service to offer or otherwise make available to others fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform or ones verified through automated-number-validation voice call. Subscribers can sign a form allowing them to use Caller IDs not purchased through our platform or verified by validation call for outbound calls, functionality that is restricted to customers with whom we've had human contact by phone call or in-person. This form:

- prohibits the sending of outbound traffic via the PSTN with Caller IDs not owned by the customer or the customer's subscribers; and
- states that, if Technology Innovation Lab receives notice that the Customer's outbound calls through our platform are deemed to be spam, Technology Innovation Lab has the right to disconnect the service immediately and without notice.

Analytics for Monitoring Traffic

Technology Innovation Lab works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a

traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

We use in-house and Veriswitch's SmartShield technologies for traffic analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Technology Innovation Lab's risk prevention team is alerted, which follows the defined procedures on investigating such subscribers.

We use intelligence from Stripe Radar to determine fraud factors for any new client and then analyze the traffic profile as well as use SmartShield to investigate suspicious activities.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

Technology Innovation Lab follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Technology Innovation Lab will devote sufficient resources to provide prompt and complete resources to traceback requests.

If a traceback request is sent to us, we suspend the client, investigate, and send the information back to ITG. Technology Innovation Lab commits to responding within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Blocking

Technology Innovation Lab will promptly respond to Do Not Originate requests it receives from the ITG. Technology Innovation Lab has mechanisms to automatically block suspicious calls using internal analytics. If Technology Innovation Lab's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Technology Innovation Lab will take appropriate action which may include suspending or terminating the subscriber's use of Technology Innovation Lab's network. Technology Innovation Lab will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Technology Innovation Lab will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Technology Innovation Lab will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Orlando Guitian

I, Orlando Guitian, Founder of Technology Innovation Lab, LLC, do hereby certify, under penalty of perjury, the following:

- (1) Technology Innovation Lab has fully implemented STIR/SHAKEN in the IP portions of its network.
- (1) Technology Innovation Lab's Business name and primary address are as follows:

Technology Innovation Lab, LLC
326 Broad St., Utica NY 13501
- (2) Technology Innovation Lab has the following other business name: Smart Carrier.
- (3) Technology Innovation Lab has not previously used any other business names.
- (4) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (5) The following person owns more than 10% of Technology Innovation Lab: Rachelle Guitian. She has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) Technology Innovation Lab had an affiliated entity, Technology Innovation Lab of Texas, LLC, which is now terminated.
- (7) Technology Innovation Lab's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (8) Technology Innovation Lab has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) Technology Innovation Lab is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) Technology Innovation Lab's Operating Company Number is 560J.

/Orlando Guitian/
Orlando Guitian

Date: February 19, 2026