

Greenway Communications, LLC
2026 Robocall Mitigation Program Description

Effective Date: February 24, 2026

Prepared for FCC Robocall Mitigation Database (RMD) Filing

Filed pursuant to 47 C.F.R. §§ 64.6301 and 64.6305.

Greenway Communications, LLC

2026 Robocall Mitigation Program Description

Section 1 – Regulatory Certification Statement

This Robocall Mitigation Program applies to traffic originating under OCNs 960K and 860F.

Greenway Communications, LLC (“Greenway”) originates calls on its IP-based voice network and fully implements the STIR/SHAKEN authentication framework in compliance with 47 C.F.R. § 64.6301. STI certificates are provisioned through PeeringHub under authorized delegation.

All calls originated on Greenway’s IP network are subject to STIR/SHAKEN authentication, and no originating traffic bypasses the authentication framework.

Greenway maintains a robocall mitigation program consistent with 47 C.F.R. § 64.6305. Greenway takes reasonable and effective steps to avoid originating illegal robocall traffic, including customer vetting, traffic monitoring, attestation controls, traceback cooperation, and immediate suspension authority.

Section 2 – STIR/SHAKEN Attestation Policy

Greenway applies attestation levels as follows:

A-Level: Assigned DIDs + Verified customer + SmartShield fraud screening pass.

B-Level: Partial verification.

C-Level: Limited identity confirmation.

Greenway retains sole authority over attestation level determinations and does not delegate attestation decisions to customers or downstream entities.

Section 3 – Customer Vetting (KYC) Program

Prior to activation, Greenway requires:

- Secretary of State business verification
- EIN confirmation
- Principal identification verification
- Physical address confirmation
- Campaign disclosure and traffic description
- Written TCPA compliance certification
- Disclosure of downstream entities (if marketing aggregator)

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- Beneficial ownership disclosure

All KYC records are retained for a minimum of two (2) years.

Section 4 – Numbering Resource Control Policy

- All DIDs logged in internal inventory register.
- Sub-assignment prohibited without written approval.
- Immediate reclamation upon suspension or termination.
- Periodic usage audits conducted.
- Porting requests subject to compliance review.

Section 5 – Traffic Monitoring & Fraud Mitigation

Greenway utilizes the VeriSwitch SmartShield platform for fraud detection.

- Volume anomaly detection
- Short-duration call monitoring
- Calls-per-second (CPS) monitoring
- ASR/ACD review
- Immediate suspension authority

Current traffic volume is less than 1 million MOU, allowing active oversight.

Section 6 – Traceback Cooperation Policy

Greenway commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group.

Greenway maintains a designated traceback contact registered in the Robocall Mitigation Database.

- Ability to identify originating customer
- Immediate traffic suspension capability

Section 7 – High-Risk Traffic Controls

- Prohibition on spoofing or misleading ANI
- Truthful caller identification required
- Written TCPA certification required

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- Political or short-duration campaigns require pre-approval
- Controlled ramp-up limits for new customers

Section 8 – Internal Compliance Governance

- Designated Compliance Officer
- 10-business-day RMD update requirement monitoring
- Annual March recertification review
- Record retention for a minimum of two (2) years
- Board authorization for mitigation and suspension authority

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Certification and Adoption

Greenway Communications adopted this Robocall Mitigation Program Description, LLC to support its certification in the FCC Robocall Mitigation Database.

Authorized Representative: Michael Hatfield

Name: Michael Hatfield

Title: President

Date: February 23, 2026