

Robocall Mitigation Program Description for Collection 3 LLC

Collection 3 LLC ("the Company") is committed to adhering to all applicable regulations and industry standards aimed at mitigating the potential for illegal robocall traffic. As a debt collection agency, our primary goal is to contact individuals regarding outstanding debts in accordance with relevant laws and regulations, ensuring that our communications are legitimate and not classified as unlawful robocalls.

The Company originates and terminates its own calls. As a result, we have selected **Option 2: Partial STIR/SHAKEN Implementation** under the Robocall Mitigation Database certification process, as we are implementing reasonable steps to avoid originating illegal robocall traffic. We are also committed to responding fully and promptly to traceback requests from the Commission, law enforcement, and industry traceback consortiums, and cooperating with these entities in investigating and halting any illegal robocallers that may misuse our network.

1. Call Types and Purpose

Our calls consist exclusively of debt collection efforts, which are defined as calls made to individuals regarding outstanding financial obligations or related inquiries. These calls are not intended for telemarketing, sales, or promotional purposes and are exempt from the full STIR/SHAKEN requirements under **47 CFR § 64.6305(c)**. Collection 3 LLC's calls are generally classified as non-telemarketing calls that fall under exceptions outlined by the Federal Communications Commission (FCC), as they are not intended for unsolicited commercial purposes.

2. Robocall Mitigation Measures

To ensure that our call practices align with the expectations set forth by the Commission, **Collection 3 LLC** has implemented the following robocall mitigation measures:

- **Call Authentication:**

As part of our partial STIR/SHAKEN implementation, we have adopted the STIR/SHAKEN framework on a portion of our network. This includes the authentication and validation of calls originating from our systems to reduce the risk of spoofing and to improve the integrity of calls made to consumers.

- **Monitoring and Compliance:**

We continuously monitor the traffic generated by our call systems to ensure that it complies with all relevant regulations. We have put in place a program to identify and mitigate any potential sources of illegal robocalls, and we track and audit our outbound calling activity regularly to ensure that all calls are made within the boundaries of applicable legal and regulatory frameworks.

- **Traceback and Cooperation:**

Collection 3 LLC is committed to cooperating fully with the traceback process. We have established procedures to respond to traceback requests within 24 hours as required by

the Commission. We also collaborate with industry traceback consortiums, law enforcement, and other regulatory entities to assist in investigations and take corrective actions when necessary.

- **No Telemarketing Calls:**

Since all of our calls are directly related to debt collection, we do not make telemarketing calls or any calls intended to advertise or sell goods or services. As such, our operations meet the regulatory exemption for non-telemarketing calls, as outlined in **47 CFR § 64.6305(c)**.

3. Ongoing Compliance and Commitment

Collection 3 LLC has made a commitment to fully comply with the applicable robocall mitigation rules and to continue improving our mitigation measures. As we gradually enhance our compliance with STIR/SHAKEN protocols across our network, we remain dedicated to preventing illegal robocalls and ensuring that consumers are contacted only in accordance with relevant debt collection laws.

While we are currently in partial compliance with STIR/SHAKEN, we are actively working to expand our implementation across all parts of our network. In the meantime, we maintain a robust internal system to ensure that only legal, legitimate calls are originated and terminated from our network.

4. Exemption Justification

As a debt collection agency, **Collection 3 LLC** is exempt from full STIR/SHAKEN implementation for certain types of calls under **47 CFR § 64.6305(c)**. The calls we place are related exclusively to debt collection and do not involve marketing or promotional activities. Given the nature of our business, we believe the exemption for non-telemarketing calls applies, and as such, we are not required to fully implement STIR/SHAKEN on all of our outbound calls.

Conclusion

Collection 3 LLC is committed to the responsible use of telecommunications and ensuring that all outbound calls are legitimate and comply with applicable robocall mitigation requirements. Through the partial implementation of the STIR/SHAKEN framework, adherence to traceback procedures, and ongoing mitigation efforts, we strive to protect consumers from illegal robocalls while ensuring that we can effectively carry out our core business of debt collection.

We will continue to evaluate and improve our processes in order to fully comply with the robocall mitigation regulations as our business grows and as technology and rules evolve.