

ANTILLES TECHNOLOGIES LLC

Robocall Mitigation Plan & STIR/SHAKEN Certification

Effective Date: February 27, 2026

FRN: 0034558700

Company Address: 11921 Freedom Drive, Suite 550 Reston, VA 20190

Compliance Contact: Jeff LaCoursiere, Jeff@antillestechnologies.com

1. STIR/SHAKEN Implementation Certification

Antilles Technologies LLC certifies that it has fully implemented STIR/SHAKEN caller ID authentication in accordance with 47 CFR § 64.6300 and related FCC orders.

- Utilizes approved STI certificates issued by an authorized Certification Authority.
- Authenticates and digitally signs SIP calls originating on its IP network.
- Transmits SIP Identity headers consistent with ATIS standards.
- Applies appropriate A/B/C attestation levels:
 - A Attestation: Direct customer with verified right to use the calling number.
 - B Attestation: Known customer but limited verification of number authority.
 - C Attestation: Gateway traffic from another provider.

2. Robocall Mitigation Program

Antilles maintains a comprehensive robocall mitigation program reasonably designed to prevent the origination and transmission of illegal robocalls.

Know Your Customer (KYC)

- Customer identity verification and beneficial ownership validation.
- Business registration verification.
- Review of intended call use case and expected volume.

Traffic Monitoring & Analytics

- CDR monitoring and anomaly detection.
- Volume spike detection and short-duration call monitoring.
- Neighbor spoofing detection.
- Automated fraud scoring thresholds.

Third-Party Tools

- Use of industry call analytics providers.
- Automated blocking of high-risk traffic.
- Real-time alerting mechanisms.

Traceback Cooperation

- Responds to Industry Traceback Group (ITG) inquiries within 24 hours.
- Maintains internal escalation procedures.
- Cooperates with FCC Enforcement Bureau and law enforcement.

Enforcement Actions

- Immediate traffic investigation upon detection.
- Suspension or blocking of suspicious traffic.
- Service termination for confirmed violations.

3. Governance & Recordkeeping

- Designated Compliance Officer overseeing robocall mitigation.
- Documented internal compliance procedures.
- Minimum 24-month record retention for call detail records.
- Periodic compliance audits and employee training.

4. Blocking & Mitigation Policy

- Authority to block illegal traffic.
- Pre-call mitigation where risk thresholds are exceeded.

- Immediate shutdown capability for suspected unlawful campaigns.

5. Certification Statement

I certify under penalty of perjury that the foregoing is true and correct and that Antilles Technologies LLC complies with all applicable FCC STIR/SHAKEN and Robocall Mitigation Database requirements.

Executed this 27th day of February, 2026.

Keith Dezern

Chief Executive Officer

Antilles Technologies LLC