

ROBOCALL MITIGATION PROGRAM DESCRIPTION FOR SUBMISSION TO THE FCC ROBOCALL MITIGATION DATABASE

Company Name: Hwy 18, LLC (Chiirp)

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ROBOCALL MITIGATION PROGRAM SUMMARY

Hwy 18, LLC (Chiirp) provides voice services that are not subject to STIR/SHAKEN implementation, either due to the use of non-IP-based technology or a qualifying exemption. Nevertheless, we have implemented a robust robocall mitigation program consistent with the FCC's requirements under 47 CFR § 64.6305(b) to actively prevent the origination of illegal robocalls on our network.

DESCRIPTION OF ROBOCALL MITIGATION PRACTICES

1. Customer Vetting and Know Your Customer (KYC) Procedures
 - We conduct a thorough vetting process before activating outbound voice services.
 - Customers must provide valid business identification, intended use case for call traffic, and estimated call volumes.
 - We evaluate customer legitimacy and review use cases to ensure lawful call behavior.
 - Ongoing monitoring ensures customers adhere to their original use case.
2. Call Traffic Monitoring and Analytics
 - We monitor call traffic for signs of illegal robocalling, including:
 - High call volumes over short periods
 - Abnormally short average call durations
 - Repetitive calling patterns to unassigned or invalid numbers
 - Our system flags suspicious activity for review by a dedicated compliance team.
3. Complaint Intake and Response
 - We accept robocall-related complaints via email address.
 - Complaints are reviewed and investigated within 24 hours.
 - If illegal call activity is confirmed, we may issue warnings, suspend, or terminate service.
4. Traceback Cooperation
 - Hwy 18, LLC (Chiirp) fully cooperates with traceback requests from the Industry Traceback Group (ITG), law enforcement, and regulatory agencies.
 - We respond promptly to all traceback requests and take action if a customer is identified as a source of illegal robocalls.
5. Ongoing Program Review
 - Our robocall mitigation program is reviewed and updated periodically to address emerging threats and changes in FCC guidance.
 - Staff responsible for compliance receive regular training on identifying and handling suspicious call activity.

CERTIFICATION STATEMENT

Hwy 18, LLC (Chiirp) certifies that it has fully implemented the robocall mitigation program described above for all voice traffic that is not authenticated through STIR/SHAKEN. We understand that this program must be maintained and that continued access to the U.S. telephone network is contingent upon compliance with these requirements.