

Robocall Mitigation Program Description

Firm Investment Strategies Limited Liability Co.

July 3, 2025

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This document outlines the Robocall Mitigation Program implemented by Firm Investment Strategies Limited Liability Co. (“Firm Investment Strategies”), a voice service provider, in compliance with the Federal Communications Commission (FCC) requirements under 47 CFR § 64.6305(d)(2)(ii)-(iii) and the Filing Instructions Public Notice (DA 24-73). Firm Investment Strategies is committed to preventing illegal robocalls, protecting consumers, and ensuring compliance with the FCC’s STIR/SHAKEN framework and robocall mitigation regulations.

Company Information

- Company Name: Firm Investment Strategies Limited Liability Co.
- Business Address: 1309 Coffeen Avenue STE 13225, Sheridan, Wyoming 82801
- Contact for Robocall Mitigation Issues:
 - Name: Joshua Domeika
 - Title: Technician
 - Email: jdomeika@pioneergrowthequity.com
 - Phone: (610) 505-7702

Implementation of STIR/SHAKEN Framework

Firm Investment Strategies has implemented the STIR/SHAKEN caller ID authentication framework across portions of its network, as required by 47 CFR § 64.6305(d)(2)(ii). Key aspects of our implementation include:

- Calls originated by Firm Investment Strategies are signed with a B-level attestation when the caller’s identity is verified but their right to use the specific telephone number cannot be fully confirmed.
- For calls received from upstream providers lacking STIR/SHAKEN authentication, Firm Investment Strategies applies appropriate attestation levels and subjects the traffic to rigorous robocall mitigation protocols.

- As of July 3, 2025, approximately 75% of our network supports STIR/SHAKEN, with a target of full implementation by March 31, 2026.

Reasonable Steps to Avoid Originating Illegal Robocall Traffic

Pursuant to 47 CFR § 64.6305(d)(2)(ii), Firm Investment Strategies has implemented a comprehensive set of reasonable steps to prevent the origination of illegal robocall traffic, including:

- Know-Your-Customer (KYC) Procedures: All new and existing customers undergo a thorough vetting process to verify their identity, business purpose, and compliance with FCC regulations. Contracts explicitly prohibit the use of our services for illegal robocalls, with termination clauses for non-compliance.
- Real-Time Traffic Monitoring: We deploy advanced analytics software to monitor call patterns in real time, identifying anomalies such as high-volume short-duration calls, spoofed numbers, or calls from unallocated numbers. Suspicious traffic is flagged, investigated, and blocked if necessary.
- Do-Not-Originate (DNO) List Compliance: Firm Investment Strategies maintains an up-to-date DNO list, incorporating numbers identified by the FCC, Industry Traceback Group (ITG), and other industry sources. Calls from these numbers are automatically blocked at the network level.
- Upstream Provider Agreements: We require all upstream providers to implement STIR/SHAKEN or equivalent robocall mitigation measures. Non-compliant providers face traffic restrictions or termination of service agreements.
- Consumer Feedback Mechanism: A dedicated portal (<https://www.firminvestmentstrategies.com/complaints>) allows consumers to report suspected illegal robocalls. Complaints are promptly investigated, and identified sources of illegal traffic are mitigated.
- Fraud Detection Enhancements: We utilize machine learning algorithms to detect and predict robocall patterns, enabling proactive mitigation of potential illegal traffic.

Commitment to Traceback Requests

Firm Investment Strategies commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) within 24 hours, as required by 47 CFR § 64.6305(d)(2)(ii). Our traceback process includes:

- Dedicated Contact: All traceback requests are directed to Joshua Domeika, Technician (jdomeika@pioneergrowthequity.com), who ensures rapid response and coordination.
- Cooperation with Authorities: We provide call detail records (CDRs), signaling data, and other relevant information to assist in identifying the source of illegal robocalls. Our team collaborates fully with the FCC, law enforcement, and ITG during investigations.
- System Integration: Our network is integrated with the ITG's traceback portal, enabling seamless and efficient responses to traceback requests.

Enforcement Actions or Investigations

As required by 47 CFR § 64.6305(d)(2)(iii), Firm Investment Strategies confirms that, in the prior two years (from July 3, 2023, to July 3, 2025), neither Firm Investment Strategies nor any entity with which it shares common ownership, management, directors, or control has been subject to a formal FCC, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing related to illegal robocalls, spoofing, or deficient RMD certifications or mitigation program descriptions.

Additional Mitigation Measures

To further strengthen our robocall mitigation efforts, Firm Investment Strategies has implemented the following measures:

- Staff Training Programs: All employees involved in network operations and customer onboarding receive annual training on FCC robocall regulations, STIR/SHAKEN protocols, and best practices for identifying and mitigating illegal traffic.
- Industry Collaboration: We actively participate in industry initiatives, including USTelecom's ITG and other robocall mitigation forums, to stay informed about evolving threats and share best practices.
- Technology Investments: We are deploying next-generation firewalls and AI-driven analytics to enhance our ability to detect and block illegal robocall traffic in real time.
- Regular Audits: Our robocall mitigation program undergoes quarterly internal audits to ensure compliance with FCC requirements and identify areas for improvement.

Principals, Affiliates, Subsidiaries, and Parent Companies

- Principals: Andrew Pierce (Managing Director, 100% ownership).
- Affiliates: None.
- Subsidiaries: None.
- Parent Companies: None.

Certification

Firm Investment Strategies Limited Liability Co. certifies that the information provided in this Robocall Mitigation Program Description is accurate and complete to the best of its knowledge. This program is designed to ensure compliance with FCC regulations, prevent the origination of illegal robocalls, and protect consumers from unwanted and unlawful calls.

Signed,
Joshua Domeika
Technician
Firm Investment Strategies Limited Liability Co.
Date: July 3, 2025