

Robocall Mitigation Program

Cloudbridges LLC.

In accordance with 47 C.F.R. § 64.6305, Cloudbridges LLC respectfully submits this report regarding its progress in implementing the STIR/SHAKEN call authentication framework and its strategy for preventing and mitigating illegal robocalls. This document provides an overview of the current status of the Company's deployment of STIR/SHAKEN technology, as well as the internal procedures and safeguards Cloudbridges LLC (hereinafter referred to as "the Company") has established to combat unlawful robocall activity, effective as of July 7, 2025. The Company acknowledges that its policies and procedures may evolve over time, and it retains the right to amend this plan as necessary to reflect changes in operational scope, technology capabilities, and regulatory requirements.

Cloudbridges LLC operates as an independent entity and is not affiliated with, nor a subsidiary or parent of, any other organization. The Company has never undergone a merger, sale, or acquisition. Its role within the telecommunications ecosystem is that of a Voice Service Provider, delivering voice services directly to end-users. The Company is currently in the process of registering with the Secure Telephone Identity Policy Administrator (STI-PA) and will obtain its own STIR/SHAKEN digital certificate from an approved Certification Authority (STI-CA). This certificate will be used to authenticate calls originating on its network, ensuring compliance with industry standards for call authentication and trust.

While the full implementation of the STIR/SHAKEN architecture is underway, Cloudbridges LLC remains committed to preventing the origination of illegal robocalls on its platform. As an interim measure, the Company has adopted a robust robocall mitigation strategy designed to detect and deter unlawful traffic. This mitigation plan reflects the Company's proactive stance on protecting the integrity of its voice services and ensuring responsible use of its telecommunications infrastructure.

Cloudbridges LLC maintains enforceable Terms of Use and an Acceptable Use Policy as part of its customer agreements. These policies clearly outline the conditions under which the Company may suspend, restrict, or terminate service, particularly in cases involving misuse or violation of applicable laws, including those related to unlawful robocalling. In addition to customer oversight, Cloudbridges LLC also implements a formal vetting and review process for upstream providers—those entities that deliver voice traffic to our network for termination or further transit.

The Company strictly ensures that all upstream providers are actively listed in the FCC's Robocall Mitigation Database. Voice traffic is not accepted from any provider that fails to meet this registration requirement. Furthermore, Cloudbridges LLC adheres to Know-Your-Customer (KYC) practices required by its upstream partners, and has provided all necessary documentation requested in accordance with their guidelines to ensure transparency and accountability in traffic origination.

In line with best practices established by the North American Numbering Council (NANC) Call Authentication Trust Anchor Working Group, Cloudbridges LLC conducts a comprehensive

verification process for both new and existing customers. This includes collecting and evaluating entity-specific information to confirm the legitimacy of the business relationship. The Company also checks whether the customer is subject to any regulatory or legal enforcement actions that might limit their ability to engage in certain types of calling, such as restrictions on telemarketing.

Additionally, where feasible, Cloudbridges LLC verifies that customers have valid authorization to use the telephone numbers they claim. This verification helps determine the appropriate STIR/SHAKEN attestation level assigned to calls originated on behalf of the customer, further enhancing trust and accountability across the voice network.

Cloudbridges LLC includes strict contractual provisions that explicitly prohibit customers from initiating unlawful robocalls using its services. In the event that a customer is found to be generating suspicious or potentially illegal robocall traffic, the Company promptly issues a warning and conducts further investigation. Should the activity persist after notice has been given, Cloudbridges LLC takes immediate action by suspending or terminating the customer's service to prevent further abuse of its network.

In addition to overseeing its direct customers, Cloudbridges LLC requires all upstream providers to maintain a reasonable and documented Robocall Mitigation Plan. This plan must include robust procedures for vetting their own customers and upstream sources, as well as the use of call analytics systems to detect, monitor, and respond to suspicious traffic patterns. Cloudbridges does not engage with upstream providers that fail to demonstrate effective mitigation practices.

Before provisioning services to new customers, Cloudbridges LLC follows a careful onboarding and screening process designed to minimize the risk of enabling robocall traffic. A key component of this process is the implementation of Know Your Customer (KYC) protocols. Although the Federal Communications Commission (FCC) does not mandate a specific KYC form, it requires voice service providers to gather and assess sufficient information to assign appropriate attestation levels under the STIR/SHAKEN framework. As part of this obligation, Cloudbridges LLC collects detailed business and identity information from all customers to verify their legitimacy and assess the potential risk associated with their traffic.

To support this process, Cloudbridges LLC has adopted a standardized customer information form tailored to meet regulatory expectations and internal compliance standards. The form gathers essential data such as business name, contact details, identification documents, and other relevant credentials necessary to verify the customer's identity. The Company ensures that all personal and business information collected through this process is securely stored and managed in full compliance with applicable privacy laws and industry best practices.

Cloudbridges LLC Customer Information Form

Section 1: Personal Information

Full Name: _____

Residential Address: _____

City: _____

State: _____

Zip Code: _____

Country: _____

Date of Birth (MM/DD/YYYY): _____

Social Security Number (SSN) or Tax Identification Number (TIN): _____

Email Address:

Copy of one of the following valid identification documents:

Driver's License:

Passport:

State Identification Card: