



Robocall Mitigation Program

Introduction

This Robocall Mitigation Program outlines the compliance practices of Moose Networks, LLC (“Moose”), with regards to its efforts to reduce and eliminate unlawful robocalls traversing its network. This program is implemented throughout the organization in the form of policies and practices as necessary to ensure compliance.

Business Name and Primary Address

Moose Networks, LLC
4422 N Ravenswood, #55
Chicago, IL 60640

Effective July 21, 2025, Moose Networks intends to do business as “Binfone Telecom,” and “Capalon,” in addition to doing business as Moose Networks.

No other business names have been used in the past by Moose.

OCN

Moose Networks has been issued the OCN 607L by NECA.

Service Provider Type

Moose is a domestic entity that operates as a Voice Service Provider and an Intermediate Provider. Moose is not a foreign voice service provider.

Robocall Mitigation

All of the calls Moose originates on its network are subject to this robocall mitigation program. Moose has had no prior certification removed by

Commission action and has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

During the prior two years, Moose (nor any entity for which Moose shares common ownership, management, directors, or control) has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Program Details

Moose's Robocall Mitigation Program begins with its employee training. All employees are trained on the basics of robocalls, on Moose's Mitigation Program, and on Moose's Know Your Customer (KYC) standards. Within the lifecycle of a customer, Moose repeatedly performs KYC applicable to the phase of lifecycle. Moose reviews prospective customers for red flags. It then reviews customers' corporate structure and attempts to confirm it is working with a given, known entity. It reviews customer use cases and identifies appropriate risk management for the customer. When appropriate, it reviews Robocall Mitigation Programs. FCC records are reviewed to identify possible past compliance history. Throughout a customer's lifecycle, changes such as traffic patterns, corporate names, or regulatory action often also triggers a re-review of a customer's risk profile.

Beyond KYC, Moose monitors customer traffic with proprietary algorithms, reviewing against known bad traffic patterns and behaviors. In addition to internal signs, any complaints or enforcement actions trigger immediate review.

Moose also compares calls to block lists, including its own lists and Do Not Originate lists. It does not accept unsigned calls for transit, and validates all calls originating from, transiting, or terminating to its network.

In so much as Moose is doing business with another service provider, it specifically requires and reviews:

- The legitimacy of the customer entity
- The customer's US address
- Customer's RMD filing
- Customer's 499 filing ID

- Customer website and email address associated with the entity name
- STIR/SHAKEN deployment

Know Your Customer

Moose requires its customers to provide sufficient information to determine their identity, relative to the risk they pose to the network. This includes reviewing and verifying, to the best of Moose's ability, the corporate entity information, the FCC registration number, 499 filer, and Robocall Mitigation Database filing. Moose only accepts traffic from service provider customers who have current Robocall Mitigation Database filings. Moose verifies the provider has affirmatively submitted the filing, and that filing has not been de-listed pursuant to an enforcement action.

Traceback Handling

Moose will respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium ("ITG") within 24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use Moose's network and services to originate, carry or process calls.

The person responsible for addressing robocall mitigation-related issues, and the primary contact for Tracebacks is:

Justin Newman, Manager, 4422 N Ravenswood Ave., #55, Chicago, IL 60640.

rmd-traceback@moosenetworks.com. (312) 265-6501.

Any use of this contact information for purposes other than by regulatory bodies or for robocall mitigation is prohibited.

STIR/SHAKEN Framework

Moose has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates will be compliant with § 64.6301(a)(1) and (2).

Principals, Affiliates, Subsidiaries & Parent Companies:

Moose Networks, LLC is a Limited Liability Company organized in the State of Illinois. It is owned 60% by Uptown Moose, LLC., an Delaware Limited Liability Company, recently converted from an Illinois Corporation, and 40% by Wong Computing Services, LLC, a Kansas Limited Liability Company.

Uptown Moose, LLC is 100% owned by Justin Newman.

Wong Computing Services, LLC is 100% owned by Patrick Wong.

Moose's manager is Justin Newman. Justin Newman and Patrick Wong are both key executives, involved in the daily operations of Moose Networks.

Moose Networks is a domestic service provider.

Uptown Moose, LLC owns 100% of Cornfield Voice LLC.

Uptown Moose, LLC owns 100% of Baltimore-Washington Telephone Company.