

Robocall Mitigation Plan

Telaria LLC maintains and enforces a comprehensive robocall mitigation program to prevent the origination and transmission of illegal robocalls. This program is designed to comply with FCC regulations, including those established under the TRACED Act and 47 CFR § 64.6300 et seq., and to align with industry best practices. As Telaria LLC is currently in a pre-operational phase and does not yet originate voice traffic or offer services, certain exemptions apply, as detailed below.

1 Exemption from STIR/SHAKEN Implementation

Telaria LLC is currently exempt from implementing the STIR/SHAKEN call authentication framework under 47 CFR § 64.6301 because the company is not yet operational and does not originate or transmit voice traffic. STIR/SHAKEN requires voice service providers to authenticate caller ID information for calls transmitted over IP networks. As Telaria LLC is in the pre-operational phase and has not yet begun selling services or generating call traffic, there are no calls to authenticate at this time, rendering STIR/SHAKEN implementation technically infeasible.

This exemption applies because:

- **No Active Voice Traffic:** Telaria LLC does not currently originate or transmit voice calls, as the company is not yet offering services to customers.
- **Pre-Operational Status:** As a new provider, Telaria LLC is still establishing its infrastructure and has not yet activated services that would generate call traffic subject to STIR/SHAKEN requirements.
- **No Risk of Illegal Robocalls:** Without active call traffic, there is no current risk of Telaria LLC facilitating illegal robocalls, aligning with the purpose of the exemption.

Telaria LLC is committed to implementing STIR/SHAKEN and other robocall mitigation measures as soon as operations commence and call traffic is originated. The company will ensure full compliance with FCC rules and industry standards once services are active.

2 Robocall Mitigation Program

To ensure compliance with FCC requirements and prevent illegal robocalls once operations begin, Telaria LLC has developed the following robocall mitigation program:

- **Call Authentication:** Upon commencing operations, Telaria LLC will implement STIR/SHAKEN protocols to authenticate calls where technically feasible, ensuring the integrity of caller identity and preventing spoofed calls.
- **Customer Vetting:** Rigorous customer identity verification and traffic vetting processes will be conducted before service activation to prevent misuse by bad actors.

- **Traffic Monitoring and Blocking:** Once operational, Telaria LLC will continuously monitor call patterns and utilize analytics-based systems to detect and block known unlawful traffic.
- **Caller ID Compliance:** Telaria LLC will require the use of valid caller ID information and strictly honor Do-Not-Originate lists to prevent unwanted calls.
- **Cooperation with Authorities:** Telaria LLC will fully cooperate with traceback requests and law-enforcement inquiries to address any illegal robocalling activities.
- **Abuse Investigation and Remediation:** Any suspected abuse will be immediately investigated, with remedial actions including service suspension or customer termination when necessary.

3 Commitment to Ongoing Compliance

This robocall mitigation plan is regularly reviewed and updated to ensure ongoing compliance with FCC rules and alignment with evolving industry standards. Telaria LLC is committed to implementing the above measures as soon as the company begins originating voice traffic and offering services. The company will file updates to its Robocall Mitigation Database submission as required to reflect operational changes and compliance efforts.

Signature: Seth Sabo