

Cacophonney, LLC – Robocall Mitigation and Compliance Plan (2025)

1. Purpose This policy defines the procedures and standards Cacophonney, LLC uses to ensure that all customers utilizing its telecom and marketing infrastructure operate in compliance with applicable federal and state regulations, including the FCC, TCPA, USAC, STIR/SHAKEN, and Telemarketing Sales Rule (TSR). This document also serves as the company's Robocall Mitigation and Compliance Plan for purposes of the FCC Robocall Mitigation Database and related regulatory filings.
2. STIR/SHAKEN Implementation Status Cacophonney has fully implemented STIR/SHAKEN across all IP-based voice traffic in compliance with 47 CFR § 64.6301(a). All calls originating on our IP network are authenticated and verified using STIR/SHAKEN protocols. Full implementation ensures attestation integrity and proper caller ID authentication for every outbound call. Cacophonney continually monitors token validation and call-signing performance to ensure full operational compliance. Any non-IP segments are subject to the mitigation measures described in this plan.
3. Traceback Participation Procedure Cacophonney participates in the Industry Traceback Group (ITG) and fully cooperates with all traceback requests from the ITG and the FCC Enforcement Bureau.

Upon receiving a traceback request, Cacophonney will:

1. Acknowledge receipt within 24 hours.
2. Provide accurate call path and customer-of-record information promptly.
3. Maintain call logs and records sufficient to identify call originators.
4. Cooperate with upstream and downstream carriers to trace the call source.
5. Coordinate with compliance and legal staff to ensure timely responses to regulators.

The designated contact for traceback participation is:
Compliance Officer: Vincent W. Kahn Email: compliance@cacophonney.com Phone: [Insert business phone number]

4. Customer Vetting & Onboarding - Business Verification: Confirm each customer's legal entity name, EIN, and state registration before activation. - Service Scope Disclosure: Require detailed documentation of the customer's intended use (e.g., B2B calls, lead generation, telemarketing). - Compliance Attestation: Obtain a signed certification confirming compliance with the TCPA, DNC Registry, and all relevant telemarketing laws. - Identity Verification: Validate contact information, billing address, and responsible officers. Customers must re-sign compliance acknowledgments annually. New customers receive a Compliance Packet outlining expectations and required documentation.

5. Contractual Safeguards - All customer contracts must include prohibitions on illegal robocalling, spoofing, or call masking. - Explicit clauses requiring DNC scrubbing and recordkeeping. - Indemnification protecting Cacophonney, LLC against regulatory actions. - Requirements for written consent for any automated dialing or prerecorded messages. - Customers must re-sign compliance acknowledgments annually and maintain records of express consent.

6. Technical Controls & Monitoring - STIR/SHAKEN Verification: All outbound calls must originate from attested Caller IDs with proper A- or B-level tokens. - Traffic Surveillance: Cacophonney monitors CDRs for high short-duration call ratios, suspicious volume spikes, and

patterns consistent with spam or non-consented outreach. - DID Management: Assign registered, traceable DIDs only; block unregistered numbers. - Opt-Out Compliance: Ensure SMS and voice campaigns include clear opt-out instructions; process removals immediately. - Filtering and Blocking: Employ real-time analytics and third-party solutions to filter and block suspicious traffic patterns.

7. Regulatory Filings & Documentation - Maintain current filings: FCC Form 499-A (annually) and 499-Q (quarterly). - USAC Filer ID and contribution documentation. - OCN / CIC records with iConnectiv, where applicable. - Retain call detail records, consent logs, and attestation data for at least 24 months. - Submit regulatory reports promptly and ensure contribution payments are up to date. - Update Robocall Mitigation Database (RMD) entries promptly upon material changes.

8. Customer Training & Education - Provide each new customer with a Compliance Packet containing TCPA & TSR summary, DNC registry procedures, consent recordkeeping examples, and STIR/SHAKEN attestation guidance. - Conduct quarterly webinars or distribute compliance updates. - Require designated compliance contacts for all customers and document training attendance.

9. Traffic Monitoring and Control Cacophonney continuously monitors outbound call traffic for high short-duration call ratios, anomalous spikes, or irregular calling patterns. Any customer exhibiting traffic inconsistent with normal operations may be subject to immediate review, mitigation, or suspension. Escalation procedures are in place to address suspected unauthorized or abusive traffic.

10. Recordkeeping and Documentation Cacophonney maintains call detail records, consent logs, and STIR/SHAKEN attestation data for a minimum of 24 months, in accordance with FCC and USAC guidelines. Reports and certifications are reviewed quarterly and updated annually. Access to records for regulatory or investigative purposes will be provided upon request in accordance with legal obligations.

11. Enforcement & Termination Violations may result in immediate suspension of service. Repeat or severe infractions may lead to permanent termination and regulatory notification. Compliance investigations will include written findings and recommendations. Customers subject to termination may be reported to appropriate regulators if required by law.

12. Internal Oversight Cacophonney's Compliance Officer will conduct quarterly audits. Annual reviews will evaluate effectiveness of vetting, monitoring, and documentation. Updates to this plan must be approved by the Managing Director. The Compliance Officer is responsible for maintaining coordination with legal counsel and industry groups to track regulatory changes and best practices.

13. Contact Information Authorized by: Vincent W. Kahn, Managing Director, Cacophonney, LLC
Effective Date: November 1, 2025 Review Cycle: Annual

Appendix A: Example Mitigation Steps - Know-Your-Customer (KYC) procedures for onboarding and

periodic re-verification. - STIR/SHAKEN token monitoring and reconciliation processes. - Real-time filtering thresholds and notification workflows. - Incident response checklist and escalation matrix. - Template notice language for requesting additional information from customers.