

Robocall Mitigation Program

1. Scope and Network Structure

SHINGLUEN CO., LTD. is a foreign voice service provider based in Hong Kong. We do not own or operate switching or transmission facilities in the United States. All outbound calls to U.S. numbers are originated by our customers, processed by our platform, and delivered to the United States exclusively through an upstream interconnection partner located in the U.S. This partner has fully implemented the STIR/SHAKEN authentication framework with full attestation, ensuring compliance with 47 CFR §64.6301(a)(1)-(2) for all calls we deliver.

2. Exemption Justification

Under 47 CFR §64.6301, foreign voice service providers without facilities in the U.S. are not directly subject to the STIR/SHAKEN implementation requirement, provided that their calls are handed off to a downstream carrier that has implemented STIR/SHAKEN. Our interconnection arrangement fully meets this condition.

3. Robocall Mitigation Measures

Even without a direct STIR/SHAKEN obligation, SHINGLUEN maintains a robocall mitigation program in line with 47 CFR §64.6305(a), including:

- ***Traffic Monitoring & Analysis***
- ***Call Blocking & Enforcement***
- ***Complaint Handling***
- ***Cooperation with Authorities***
- ***Ongoing Monitoring & Improvement***

SHINGLUEN CO., LTD.

Stanley Du

Director