

Robocall Mitigation Program Description

1. Company Information

Our company is a reseller of VoIP services. We provide end-user voice services through upstream wholesale providers. We do not operate our own switching facilities or maintain direct control over numbering resources. As such, we are classified as a Voice Service Provider (reseller) under FCC rules.

2. STIR/SHAKEN Status and Exemption

Pursuant to 47 C.F.R. § 64.6305(d)(2)(i), our company is exempt from implementing STIR/SHAKEN. We are a pure reseller and do not control the network infrastructure, SIP headers, or certificate authority relationships necessary to perform STIR/SHAKEN authentication. Our upstream wholesale carriers, who own and operate the network infrastructure, are responsible for STIR/SHAKEN signing. Our Robocall Mitigation Database (RMD) filing properly reflects "No STIR/SHAKEN Implementation."

3. Robocall Mitigation Practices

Although exempt from STIR/SHAKEN, our company maintains a robust robocall mitigation program, which includes: - Vetting all customers before service activation, including Know-Your-Customer (KYC) procedures. - Monitoring call traffic for suspicious or abnormal patterns indicative of robocalling or spoofing. - Responding promptly to traceback requests from the Industry Traceback Group (ITG) and the FCC. - Taking immediate enforcement actions against customers found to be originating illegal robocalls, up to and including service termination. - Coordinating with our upstream providers to ensure that authenticated calls are properly signed at the network level.

4. Company Structure

Principals: Mark Su – CEO Alex Sehr – Vice President Affiliates: None Subsidiaries: None Parent Companies: None

5. Certification

This document certifies that our company, as a reseller VoIP provider, complies with FCC requirements by filing in the Robocall Mitigation Database as "No STIR/SHAKEN Implementation" and by maintaining the above-described mitigation measures to protect consumers and the integrity of the U.S. voice network.