

Robocall Mitigation Program Description

Copperband Technologies, LLC

FCC FRN: 0026652776

1. Company Overview

Copperband Technologies, LLC is a facilities-based and VoIP service provider that supplies Hosted VOIP and SIP trunking services to enterprise customers and managed PBX systems. We do not provide retail auto-dialing or mass-calling services, and our managed PBX systems have no capability for automated robocalling. Our business is focused on managed voice services for legitimate end-user communications.

2. STIR/SHAKEN Implementation

Copperband Technologies, LLC has implemented the STIR/SHAKEN framework on the IP portions of its network in accordance with 47 CFR § 64.6301. All outbound SIP and Hosted VOIP traffic is subject to STIR/SHAKEN attestation to authenticate caller ID information when technically feasible.

3. Reasonable Steps to Prevent Illegal Robocalls

Pursuant to 47 CFR § 64.6305(d)(2)(ii)–(iii), our robocall mitigation program consists of the following specific practices:

- **Know-Your-Customer (KYC) Procedures**
 - We verify the identity of all customers before providing Hosted VOIP and SIP trunking services.
 - New and renewing customers must provide valid business identification (business license, tax ID, service agreement).
 - Contracts expressly prohibit use of our service for illegal robocalling or spoofing.
- **Traffic Monitoring & Analytics**

- We monitor call volumes, patterns, and destinations for anomalies consistent with unlawful robocall campaigns (e.g., short-duration, high-frequency calls).
 - If suspicious activity is detected, we immediately investigate and may suspend or terminate service.
 - **Blocking/Filtering**
 - We maintain the ability to block or restrict traffic associated with known bad actors or identified by traceback investigations.
 - We block calls from numbers not assigned or authorized to the customer.
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4. Cooperation with Traceback Requests

We commit to fully and promptly (within 24 hours) responding to traceback requests from the Commission, law enforcement, or the registered industry traceback consortium (USTelecom), as required by 47 CFR § 64.6305. We will provide all available information to assist in identifying the source of suspected illegal robocalls.

5. Contractual Controls

All service agreements include clear terms that prohibit the origination of illegal robocalls and caller ID spoofing. Customers found to be in violation are subject to immediate suspension or termination of service.

6. Statement of Compliance

Copperband Technologies, LLC certifies that:

- All calls we originate are subject to this robocall mitigation program;
 - We have fully implemented STIR/SHAKEN on the IP portions of our network;
 - We are not subject to any current FCC, law enforcement, or regulatory enforcement actions related to unlawful robocalling or spoofing.
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Responsible Officer:

Name: Christopher McQuiston

Title: CTO

Department: Accounting

Business Address: 1775 Alpine Dr, Clarksville, TN 37040

Phone: 931-263-8000

Email: accounting@copperbandtech.com

A handwritten signature in black ink, appearing to read "C. McQuiston". The signature is fluid and cursive, with a large loop at the end of the last name.