

Robocall Mitigation Program Description

Entity Name: Fractal, LLC

FRN: 0037493699

Contact Name: Steven Meyer

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STIR/SHAKEN Implementation Status

Fractal, LLC certifies that it is fully implementing STIR/SHAKEN. All outbound calls are signed and verified under agreements with Twilio, which provides complete STIR/SHAKEN coverage for calls carried through its network.

Robocall Mitigation Program Description

Know Your Customer (KYC): All accounts are verified and associated with real business identities before activation. Verification includes review of business registration, tax information, and contact validation.

Traffic Monitoring: Outbound usage is continuously monitored for unusual call patterns, including but not limited to spikes in short-duration calls, high-volume traffic, or traffic to high-risk destinations. Accounts with flagged activity are reviewed daily.

Enforcement: Any accounts found to be in violation of Twilio's Acceptable Use Policy or FCC rules are suspended immediately pending review. Confirmed violators are terminated.

Traceback Cooperation: Fractal, LLC fully cooperates with traceback requests from the USTelecom Industry Traceback Group and the FCC. We commit to responding to all traceback requests within **24 hours**.

Compliance with Upstream Provider: Fractal, LLC leverages Twilio's industry-standard fraud detection, STIR/SHAKEN implementation, and robocall prevention tools to supplement its own controls.

Internal Controls: Staff are trained to review flagged activity, document enforcement actions, and escalate potential violations. Internal audit logs are maintained for compliance purposes.

Regulatory History

Fractal, LLC has **not been the subject of any formal FCC, law enforcement, or regulatory action related to robocalls in the last two years.**

Traceback Point of Contact

Name: Steven Meyer

Title: CIO

Email: smeyer@fractalcts.com

Phone: (917) 826-6664

Availability: 24/7 for traceback and enforcement requests

Confidentiality

Fractal, LLC has requested that certain details of this filing be kept confidential in the ECFS system.

Certification

I, Steven Meyer, certify that Fractal, LLC has taken reasonable steps to ensure that its voice services are not used to originate illegal robocalls. This certification is made in good faith and is accurate to the best of my knowledge.

Signed electronically,

Steven Meyer

Fractal, LLC

Date: September 11, 2025