

Robocall Mitigation Program

I. Background

J Wynegar Jr Inc dba SmokeyTEL ("SmokeyTEL") files this Robocall Mitigation Plan in compliance with the Federal Communications Commission ("FCC") requirements under 47 CFR § 64.6305. SmokeyTEL certifies in the FCC's Robocall Mitigation Database (RMD) that all calls originated, carried, or processed by the company are subject to a mitigation program consistent with Commission rules. SmokeyTEL has implemented policies and controls to prevent the origination of unlawful robocalls, and commits to cooperating with regulators, law enforcement, and the industry traceback consortium in investigations.

II. STIR/SHAKEN Compliance

SmokeyTEL does not directly implement STIR/SHAKEN certificates, but relies on its upstream carriers to perform all caller ID authentication. Specifically:

- Bulk Solutions, LLC (RMD 0022777379) – Fully implemented STIR/SHAKEN.
- Anveo, Inc. (RMD 0024648255) – Fully implemented STIR/SHAKEN.
- Telnyx, LLC (RMD 0018998724) – Fully implemented STIR/SHAKEN.
- Skye Telecom LLC (RMD 0025940651) – Fully implemented STIR/SHAKEN.

All outbound calls placed by SmokeyTEL are routed exclusively through these upstream providers. Since each has certified complete deployment of STIR/SHAKEN in the FCC's Robocall Mitigation Database, caller ID authentication is performed entirely by these carriers on SmokeyTEL's behalf.

III. Exemption Justification

Pursuant to 47 CFR § 64.6301(a)(4), SmokeyTEL is exempt from directly implementing STIR/SHAKEN because it is not a facilities-based voice service provider with its own interconnection to the PSTN. All outbound calls are routed exclusively through upstream providers that have fully deployed STIR/SHAKEN. SmokeyTEL enforces strict customer vetting, traffic monitoring, and traceback compliance as required by FCC rules.

IV. Know Your Customer (KYC) Standards

SmokeyTEL undertakes commercially reasonable measures to validate customer identity and intended use of services before activating telecom accounts. Customers must provide:

- Proof of incorporation or business registration (for entities).
- Valid personal identification and contact information (for individuals).
- Description of intended use of services, with disclosure of traffic type and volume.

SmokeyTEL reserves the right to deny service to customers engaged in questionable practices or who fail to provide required compliance documentation.

V. Acceptable Use Policy

All customers must comply with SmokeyTEL's Acceptable Use Policy (AUP), which prohibits the use of services for illegal, abusive, fraudulent, or deceptive activities. This includes compliance with:

- The Telephone Consumer Protection Act (TCPA).
- The Telemarketing Sales Rule (TSR).
- The Truth in Caller ID Act.
- All applicable FCC regulations.

Violations may result in suspension or termination of services.

VI. Monitoring and Enforcement

SmokeyTEL actively monitors customer traffic for abnormal patterns, including:

- Short call durations.
- Excessive call attempts.
- Use of unassigned or invalid telephone numbers.
- High-volume patterns consistent with robocalling or spoofing.

Suspicious traffic is investigated promptly. Accounts confirmed to be originating unlawful robocalls may be suspended or terminated.

VII. Traceback Cooperation

SmokeyTEL commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG). Dedicated resources are allocated to ensure timely and complete responses.

VIII. Enforcement History

SmokeyTEL affirms that it has not been the subject of any FCC, law enforcement, or regulatory enforcement action related to illegal robocalls, spoofing, or deficient mitigation practices.

IX. Company Information

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