

Robocall Mitigation Program

Company Information

Legal Company Name: Upword Solutions, Inc.

DBA : Innovatek Solutions

FCC Registration Number (FRN): 0037483070

Service Type: Voice Service Provider / Reseller

Effective Date: 1/20/26

1. Purpose

This Robocall Mitigation Program is designed to ensure that Upword Solutions, DBA – Innovatek Solutions takes reasonable and effective steps to prevent the origination and transmission of illegal robocalls, including unlawful spoofed calls, in compliance with Federal Communications Commission (FCC) rules, including 47 CFR §64.6305.

2. STIR/SHAKEN Implementation Status

Upword Solutions, DBA – Innovatek Solutions has not fully implemented STIR/SHAKEN authentication technology.

All IP-based calls originated by Upword Solutions, DBA – Innovatek Solutions are authenticated using the STIR/SHAKEN framework where technically feasible.

3. Robocall Mitigation Measures

Upword Solutions, DBA – Innovatek Solutions employs the following mitigation strategies to prevent illegal robocalls:

a. Customer Vetting and Onboarding

- Verification of customer identity prior to service activation
- Collection of business documentation where applicable
- Validation of intended use of voice services
- Prohibition of robocalling activity unless legally permitted

b. Traffic Monitoring and Analytics

- Continuous monitoring of call traffic patterns
- Automated detection of abnormal call volumes, short-duration calls, or high call failure rates
- Identification of traffic indicative of robocall or spoofing behavior

c. Call Blocking and Enforcement

- Immediate suspension or blocking of traffic that is suspected to be illegal
- Rapid response to traceback requests from industry groups or regulators
- Termination of customers engaged in illegal robocalling activity

d. Complaint Handling

- Review of consumer complaints from regulators, carriers, or end users
 - Timely investigation of complaints
 - Corrective actions taken when violations are identified
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4. Response to Traceback Requests

Upword Solutions, DBA – Innovatek Solutions commits to:

- Responding fully and promptly to traceback requests from the FCC, law enforcement, or authorized traceback consortiums (e.g., USTelecom ITG)
 - Providing relevant call records consistent with legal and privacy obligations
 - Taking immediate corrective action when illegal traffic is confirmed
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5. Recordkeeping

Upword Solutions, DBA – Innovatek Solutions maintains records related to:

- Customer identity verification
- Call detail records (CDRs)
- Complaint investigations
- Enforcement actions

Records are retained for a minimum of 12 and made available to the FCC upon request.

6. Program Oversight and Accountability

A designated compliance officer is responsible for the administration and enforcement of this Program.

Compliance Contact:

Name: Matt Towers

Title: Owner

Email: matt@innovateksolutions.net

Phone: 419-445-8088

7. Ongoing Review and Updates

This Robocall Mitigation Program is reviewed periodically and updated as necessary to reflect changes in FCC regulations, industry best practices, and technological capabilities.

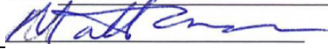
8. Certification

I certify that the above Robocall Mitigation Program is accurate and that Upword Solutions, DBA – Innovatek Solutions has implemented the practices described herein to the best of my knowledge and belief.

Authorized Representative:

Name: __Matt Towers_____

Title: __Owner_____

Signature: _______

Date: __1-20-26_____
