

## **Robocall Mitigation Program Description (FCC Submission)**

HRJ Communications has implemented a Robocall Mitigation Program to prevent the origination and transmission of illegal, unwanted, or spoofed robocalls on its network, in compliance with the Federal Communications Commission's rules and the TRACED Act.

The program includes the following elements:

1. **STIR/SHAKEN Implementation**  
HRJ Communications has implemented STIR/SHAKEN authentication where technically feasible. For traffic that cannot be authenticated, alternative mitigation measures are applied as described below.
2. **Customer Vetting and Onboarding**  
HRJ Communications conducts reasonable and appropriate due diligence on all customers prior to initiating service. This includes verifying customer identity, intended use of service, and call traffic profiles. Enhanced scrutiny is applied to high-volume or high-risk traffic.
3. **Traffic Monitoring and Detection**  
HRJ Communications monitors voice traffic on an ongoing basis to identify patterns indicative of illegal or suspicious robocalling activity, including excessive call volumes, short-duration calls, invalid or unassigned numbers, and known scam signatures.
4. **Prohibition of Illegal Traffic**  
Illegal robocalls, spoofed caller ID, scam-related calls, and any traffic that violates FCC rules or applicable law are strictly prohibited. Identified violations result in immediate mitigation actions.
5. **Mitigation Actions and Enforcement**  
When suspect or unlawful traffic is identified, [Company Name] takes prompt corrective action, which may include blocking calls, notifying the customer, suspending service, or terminating service as appropriate.
6. **Complaint Handling and Response**  
HRJ Communications maintains procedures to receive, investigate, and respond to consumer, carrier, and regulatory complaints in a timely manner. Confirmed violations are escalated and remediated promptly.
7. **Ongoing Program Review**  
The Robocall Mitigation Program is reviewed and updated periodically to address emerging threats, regulatory updates, and industry best practices.

HRJ Communications is committed to cooperating with the FCC, law enforcement, and industry partners to combat illegal robocalls and protect consumers.