

Robocall Mitigation Program Description

Provider Name: Pumpkin LLC

FCC Registration Contact:

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Pumpkin LLC is a U.S.-based, facilities-based voice service provider offering retail VoIP services. Pumpkin LLC is **not** a gateway provider, wholesaler, or foreign provider.

STIR/SHAKEN Status

Pumpkin LLC has implemented the STIR/SHAKEN caller ID authentication framework on all IP portions of its network where it originates SIP voice calls, in compliance with 47 CFR § 64.6301. Pumpkin LLC signs outbound calls using valid SHAKEN certificates associated with its assigned SPC token and verifies inbound calls when authentication information is present.

Robocall Mitigation Measures

Pumpkin LLC has implemented reasonable and effective steps to mitigate the origination and transmission of illegal robocalls on its network, including the following:

1. Customer Due Diligence (KYC):

Prior to service activation, Pumpkin LLC verifies customer identity, physical address, contact information, and intended use of voice services. Customers are screened for fraud risk, abnormal calling patterns, and prohibited use cases. Service may be denied or terminated for non-compliance.

2. Traffic Monitoring:

Pumpkin LLC monitors call traffic for indicators of illegal robocall activity, including high-volume calling, short-duration calls, repetitive dialing patterns, and signaling anomalies. Monitoring is performed using internal controls and/or third-party analytics.

3. Enforcement Actions:

Upon detection or confirmation of suspicious or illegal robocall activity, Pumpkin LLC promptly investigates and takes appropriate action, including call blocking, service suspension, or termination of offending customers.

4. Upstream and Interconnection Controls:

Pumpkin LLC maintains awareness of its upstream providers' STIR/SHAKEN status and FCC

Robocall Mitigation Database listings. Traffic from providers that are not properly listed or present elevated robocall risk may be blocked or rejected.

Traceback Cooperation

Pumpkin LLC commits to fully cooperating with traceback requests from the FCC, law enforcement, and the Industry Traceback Consortium. Pumpkin LLC will respond to traceback requests within **24 hours** and provide all reasonably available call records and supporting information.

Enforcement History Disclosure

Pumpkin LLC has not been subject to any FCC enforcement action, law enforcement action, or regulatory finding related to illegal robocalls, caller ID spoofing, or robocall mitigation deficiencies within the past two years. Pumpkin LLC does not share ownership or control with any entity that has such findings.

Ongoing Compliance

Pumpkin LLC will maintain and update this Robocall Mitigation Program as required and will update its FCC Robocall Mitigation Database filing within **10 business days** of any material change.
