

Robocall Mitigation Plan

This Robocall Mitigation Plan (“Plan”) is adopted and maintained by XPERT COMPUTER SHOP LLC.

This Plan is established pursuant to 47 C.F.R. § 64.6305 and sets forth the policies and procedures implemented to prevent the origination of illegal robocalls on the XPERT COMPUTER SHOP LLC network.

1. CONTRACT REQUIREMENT

All customer agreements prohibit illegal robocalls and allow immediate suspension or termination for violations.

2. CUSTOMER DISCLOSURES AND CONFIRMATION

All customers must disclose accurate business information, including physical location, contact personnel, jurisdiction of formation, applicable government-issued identification, and the nature of their business activities and calling traffic.

XPERT COMPUTER SHOP LLC verifies customer-provided information prior to authorizing service. Customer identity verification, legitimacy review, and risk-based vetting are conducted as further detailed in Section III (Customer Vetting Practices).

3. MONITORING AND TRACEBACK

XPERT COMPUTER SHOP LLC actively monitors its network for potential illegal robocall activity and takes appropriate mitigation actions when suspicious traffic is identified. Monitoring activities are conducted as described in Section VII (Ongoing Robocall Mitigation Practices).

All traceback requests and traceback response procedures are handled exclusively in accordance with Section II (Traceback Requests).

I. STIR/SHAKEN IMPLEMENTATION STATUS

As reflected in the FCC Robocall Mitigation Database, XPERT COMPUTER SHOP LLC has not implemented STIR/SHAKEN authentication due to network technology limitations. The company relies on the exemption provided under **47 C.F.R. § 64.6304(d)** for non-SIP network infrastructure. All originating calls remain subject to the mitigation measures described in this Plan.

II. TRACEBACK REQUESTS

XPERT COMPUTER SHOP LLC cooperates fully with the FCC, law enforcement, and the Industry Traceback Group (ITG) on all traceback requests. The company commits to responding to any traceback request within **24 hours** of receipt.

Sufficient internal resources are dedicated to ensure timely and comprehensive traceback responses. Carrier interconnection and service agreements include provisions requiring traceback cooperation and prompt identification of the upstream provider or originating customer responsible for suspected illegal robocalls.

A single point of contact for all traceback requests is identified in **Appendix A**.

III. CUSTOMER VETTING PRACTICES

XPERT COMPUTER SHOP LLC employs best practices to vet all voice service subscribers, including residential, business, and resale customers. Vetting includes verification of identity, physical location, business legitimacy, and intended use of services.

Commercial customers and resellers may be subject to enhanced due diligence, including additional background review or site visits, based on risk assessment. Service agreements and acceptable use policies expressly prohibit illegal robocalling and reserve the right to suspend or terminate service for violations.

Ongoing network monitoring and call pattern analysis are conducted as described in Section VII (Ongoing Robocall Mitigation Practices).

IV. TELEPHONE NUMBER VALIDATION PRACTICES

XPERT COMPUTER SHOP LLC maintains procedures to validate a subscriber's right to use telephone numbers associated with its services. Originating calls are permitted only from numbers assigned to or authorized for the subscriber, with automated screening controls in place for both single-line and multi-line configurations..

V. INTERNATIONAL CALL ORIGINATORS

Currently not applicable.

VI. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

XPERT COMPUTER SHOP LLC maintains established relationships with a limited number of upstream providers. Contracts with upstream providers include robocall mitigation and traceback cooperation provisions to ensure shared responsibility for preventing illegal robocall traffic.

VII. ONGOING ROBOCALL MITIGATION PRACTICES

XPERT COMPUTER SHOP LLC continuously monitors network usage and reviews call detail records (CDRs) to detect suspicious calling activity or patterns indicative of illegal robocalling. Monitoring focuses on indicators including, but not limited to:

- Abnormally high call volumes or traffic spikes
- Short-duration calls and low completion rates
- Sequential or algorithmic dialing patterns
- Calls to invalid, unassigned, or Do-Not-Originate numbers
- Calls to unallocated NPA-NXXs

When suspicious activity is detected, mitigation actions may include verification of caller ID authorization, call blocking, service suspension or termination, initiation of internal investigations, and notification to appropriate authorities.

When suspected illegal robocall activity gives rise to a traceback request, XPERT COMPUTER SHOP LLC responds in accordance with Section II (Traceback Requests).

FCC COMPLIANCE ATTESTATION

XPERT COMPUTER SHOP LLC certifies compliance with 47 C.F.R. § 64.6305.

Appendix A

Traceback Request Single Point of Contact

Name: David S Luvin

Title: OWNER

Phone: 229-938-9001

Email: david@xpertcomputershop.com

Upstream Provider Information

Provider: SKY SWITCH

Nature of Business: WHITE LABEL VOIP PROVIDER

Location: Arbor Crest I, 751 Arbor Way, Suite #150,

Blue Bell, PA 19422

Phone: Main: (747) 777-8100