

ExpressNet Technologies Robocall Mitigation Program

ExpressNet Technologies, Inc. has implemented a Robocall Mitigation Program designed to prevent the origination and transmission of illegal robocalls, including spoofed and fraudulent traffic, in compliance with FCC requirements and 47 CFR §64.6305.

STIR/SHAKEN Implementation

ExpressNet Technologies, Inc. uses its upstream carrier platform, SkySwitch, to support STIR/SHAKEN authentication for outbound calls where technically feasible. Calls are authenticated using industry-standard digital certificates to verify caller identity and assign appropriate attestation levels (A, B, or C). Signed calls are transmitted to terminating carriers to allow for verification and call treatment.

Traffic Monitoring and Analytics

ExpressNet Technologies, Inc. monitors outbound calling behavior for patterns indicative of illegal or abusive activity, including but not limited to:

- High-volume or burst calling patterns
- Short-duration calls
- Repetitive dialing
- Invalid or unassigned destination numbers

Monitoring is performed using a combination of SkySwitch-provided analytics, internal review, and customer usage audits.

Customer Vetting and Onboarding

ExpressNet Technologies, Inc. performs due diligence on all customers prior to service activation, including:

- Verification of customer identity and business purpose
- Collection of contact information and service use descriptions
- Review of intended calling use cases

High-risk use cases (e.g., call blasting, telemarketing, or automated dialing) are subject to enhanced scrutiny and may require additional documentation or approval.

Enforcement and Response Procedures

ExpressNet Technologies, Inc. maintains documented procedures to promptly investigate suspected illegal robocall activity. Upon detection or notification of suspicious traffic, actions may include:

- Immediate suspension or termination of service
- Blocking of specific numbers or call patterns
- Notification to upstream carriers and regulators when appropriate

All customers are contractually prohibited from engaging in illegal robocalling, spoofing, or violations of the TCPA, TRACED Act, or FCC rules.

Traceback Cooperation

ExpressNet Technologies, Inc. commits to fully cooperating with the FCC, law enforcement, and industry traceback efforts, including requests from the Industry Traceback Group (ITG). Traceback requests are acknowledged and responded to within 24 hours or sooner when required.

Ongoing Compliance

ExpressNet Technologies, Inc. regularly reviews its robocall mitigation practices and updates policies and procedures as necessary to remain compliant with evolving FCC regulations and industry best practices.