

BrattMobile Robocall Mitigation Program

NON-CONFIDENTIAL (Redacted Version)

1. Program Overview

BrattMobile has implemented a Robocall Mitigation Program in compliance with FCC rules (47 CFR § 64.6305 and related STIR/SHAKEN requirements). This program is designed to prevent the origination, transmission, and termination of illegal robocalls and spoofed calls on the BrattMobile network.

2. STIR/SHAKEN Implementation

BrattMobile utilizes STIR/SHAKEN call authentication technology where technically feasible. All IP-based voice traffic is authenticated using industry-standard certificate authorities and call signing frameworks.

3. Traffic Monitoring and Analytics

BrattMobile employs automated analytics and third-party reputation services to monitor outbound traffic patterns, detect anomalous behavior, and identify potential illegal robocall campaigns. Specific vendors and thresholds are redacted.

4. Customer Vetting and KYC Controls

BrattMobile performs Know Your Customer (KYC) procedures for high-volume customers, including identity verification and business validation. Specific onboarding procedures are redacted.

5. Mitigation and Enforcement Procedures

Upon detection of suspected illegal robocall activity, BrattMobile will:

- Immediately investigate traffic sources
- Suspend or block suspected lines or accounts
- Notify upstream or downstream providers if required
- Preserve call records and cooperate with traceback requests
- Terminate service where violations are confirmed

6. FCC Traceback Cooperation

BrattMobile participates in industry traceback efforts and responds promptly to lawful traceback requests from the FCC, law enforcement, and authorized industry consortiums.

7. Recordkeeping and Documentation

BrattMobile maintains documentation of its robocall mitigation practices, monitoring controls, enforcement actions, and compliance certifications. Records are retained in accordance with FCC requirements.

Certification: BrattMobile certifies that it has implemented the above-described Robocall Mitigation Program in good faith and in compliance with applicable FCC rules.