

RoguTech Global Inc.

Robocall Mitigation Program Description

FCC Robocall Mitigation Database Filing

1. Company Overview

RoguTech Global Inc. is a Voice Service Provider serving end-users in the United States. RoguTech provides VoIP services utilizing upstream carrier infrastructure for PSTN connectivity and call authentication services.

2. STIR/SHAKEN Implementation

RoguTech relies on its upstream carrier(s) for implementation of the STIR/SHAKEN caller authentication framework. All outbound traffic transmitted to the Public Switched Telephone Network (PSTN) is routed through upstream providers that have implemented STIR/SHAKEN authentication consistent with 47 CFR § 64.6301.

RoguTech does not directly originate traffic outside of its upstream carrier network.

3. Prohibition of Illegal Robocalls

RoguTech strictly prohibits:

- Illegal robocalls
- Caller ID spoofing
- Transmission of fraudulent or deceptive traffic
- Auto-dialed calls without proper consent

These prohibitions are incorporated into RoguTech's Acceptable Use Policy and client service agreements.

4. Customer Vetting (Know Your Customer – KYC)

RoguTech performs reasonable due diligence when onboarding customers, including:

- Verification of business identity

- Collection of contact information
- Review of intended use of service
- Monitoring for high-risk traffic patterns

Accounts suspected of illegal activity are subject to immediate suspension pending investigation.

5. Traffic Monitoring and Analytics

RoguTech monitors outbound traffic for indicators of suspicious activity, including:

- Unusually high call volumes
- Short-duration call bursts
- High answer-seizure ratios
- Excessive call attempts
- Repetitive or sequential dialing patterns

If abnormal traffic is detected, RoguTech investigates and may suspend or terminate service.

6. Traceback Cooperation

RoguTech commits to:

- Respond fully and within 24 hours to traceback requests
- Cooperate with the FCC, law enforcement, and the Industry Traceback Group
- Provide relevant call detail records (CDRs) as required

RoguTech maintains an active compliance contact email for regulatory communications.

7. Record Retention

RoguTech maintains call detail records and customer documentation consistent with industry standards and regulatory requirements.

8. Ongoing Compliance

RoguTech will:

- Maintain accurate contact information in the Robocall Mitigation Database
- Review this mitigation program annually
- Recertify with the FCC prior to March 1 each year

Authorized Representative:

Wilton Guerrero

Compliance Officer

RoguTech Global Inc.

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