

Robocall Mitigation Program Description

Company Legal Name: Promising Analytical Consulting Corp.

FRN: 0032771966

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Promising Analytical Consulting Corp (DBA: HelpYourIT.com) ("Company") is a VoIP reseller providing interconnected voice services to end user in the US.

The Company does not originate outbound calling campaigns and does not operate predictive dialers or call centers. The Company resells VoIP services and transmits customer traffic via upstream carrier partner.

The Company has implemented a robocall mitigation program reasonably designed to prevent the origination and transmission of illegal robocalls in compliance with 47 CFR § 64.6305.

The Company has implemented STIR/SHAKEN in the IP portions of its network consistent with applicable FCC requirements.

- Outbound IP calls are authenticated in accordance with the STIR/SHAKEN framework.
- Attestation levels are assigned based on the Company's relationship with its customer and verification of the customer's right to use the calling number.
- The Company maintains secure certificate management and private key protection procedures.
- The Company validates inbound calls where Identity headers are present.

Because the Company is a reseller and does not originate traffic directly, attestation is based on commercially reasonable verification of customer identity and number authorization.

Prior to activation of service, the Company applies reasonable Know-Your-Customer (KYC) procedures, which may include:

- Verification of customer identity
- Collection of business formation documentation (for entity customers)
- Verification of contact information and business address
- Confirmation of authority to use requested telephone numbers
- Review of anticipated service use and traffic profile

Where customer use cases present elevated risk (e.g., higher-volume outbound calling), the Company may require additional documentation and certifications regarding compliance with applicable laws, including the Telephone Consumer Protection Act (TCPA).

The Company reserves the right to decline service to customers that present unreasonable risk.

The Company conducts internal monitoring of traffic patterns and does not rely on third-party analytics vendors.

Monitoring may include review of:

- Significant or unexplained call volume spikes
- Short-duration call patterns
- Sequential or neighbor spoofing indicators
- Calls using invalid, unallocated, or unassigned numbers
- Customer complaint information, if received

Traffic anomalies are reviewed and reported to upstream carrier partner for further investigation when appropriate.

The Company has implemented reasonable safeguards to reduce the risk of illegal traffic, including:

- Blocking calls that use invalid, unallocated, or unassigned NANP numbers
- Blocking calls from numbers on recognized Do-Not-Originate (DNO) lists, where applicable
- Requiring verification of customer authority to use telephone numbers before assigning full attestation
- Investigating indications of unauthorized caller ID use

If the Company identifies or is notified of potentially illegal traffic, it may take appropriate action through upstream carrier partner, which can include:

- Notifying the customer and requesting clarification
- Requiring additional compliance documentation
- Temporarily suspending traffic
- Blocking specific numbers or traffic patterns

- Terminating service, where warranted

The Company:

- Maintains written robocall mitigation policies
- Retains call detail records through upstream carrier partner consistent with applicable law
- Conducts periodic internal compliance review
- Designates a responsible individual for oversight of robocall mitigation compliance

The Company certifies that it has implemented a robocall mitigation program reasonably designed to prevent the origination and transmission of illegal robocalls and will continue to comply with applicable federal regulations.

Best,



Shenwei Zhao

Partner

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