

Robocall Mitigation Program Description

Gemini IT 918 (fka RLC Business Services)

Gemini IT 918 is a non-facilities-based voice service provider that delivers hosted VoIP/UCaaS services to business customers using the Coredial/SkySwitch platform as our underlying upstream carrier and PSTN connectivity provider. Gemini IT 918 does not operate its own carrier-grade switches, SBCs, or direct interconnects to the public switched telephone network (PSTN), and does not possess an SPC token or STIR/SHAKEN certificate. All outbound calls to the PSTN from our end users are routed over Coredial's network, where Coredial and its vendors implement STIR/SHAKEN and associated call authentication and analytics.

Gemini IT 918 maintains and enforces a documented robocall mitigation program focused on "know your customer" (KYC), ongoing traffic monitoring, and rapid traceback cooperation. Before activating service, we perform KYC vetting on all new customers, including verification of business identity, contact information, and use-case review (such as restaurant, retail, healthcare, professional services), and we prohibit high-risk use cases (e.g., illegal lead-generation robocalling or spoofing). Our service agreements with customers require compliance with all applicable robocall and Caller ID laws and expressly prohibit the origination of illegal robocalls, Caller ID spoofing with intent to defraud, and other abusive calling practices.

Gemini IT 918 monitors call patterns on our customer accounts using the reporting and analytics made available through the Coredial platform and associated tools, with particular attention to high-volume, short-duration, or anomalous traffic that could indicate illegal robocalling activity. When/If we detect suspicious traffic or receive complaints, we immediately investigate, may temporarily block or rate-limit traffic, and, where appropriate, suspend or terminate the offending customer's service pursuant to our terms and conditions. We also maintain and apply internal "do not originate" policies for numbers that should never generate outbound calls (for example, certain inbound-only or test numbers).

Gemini IT 918 fully cooperates with traceback and enforcement efforts. We respond to traceback requests from the Industry Traceback Group, the FCC, and law enforcement within 24 business hours and supply call detail records and customer information as permitted by law to help identify and stop illegal robocallers. We also maintain current contact information and a designated compliance point of contact for robocall-related issues. In addition, we regularly review updates to FCC robocall mitigation and

STIR/SHAKEN rules and update our policies, customer contracts, and internal procedures as needed to remain aligned with evolving requirements.

Because Gemini IT 918 does not control the network elements where STIR/SHAKEN is implemented and instead uses Coredial as its upstream carrier, we are not in a position to directly authenticate and sign calls at the network level and therefore do not ourselves implement STIR/SHAKEN. Instead, we rely on Coredial and its carrier partners to perform call authentication and to apply their own robocall prevention and analytics on the PSTN interface, while Gemini IT 918 focuses on strict KYC, contractual controls, traffic monitoring, and rapid traceback cooperation to reasonably prevent and mitigate illegal robocalls originating from our end users.