

Robocall Mitigation Plan

Prepared for: LEONARDO AND COMPANY, LLC. Date: 02/23/26 FCC Filer ID: 0022423617

1. Introduction and Commitment

LEONARDO AND COMPANY, LLC (the "Company") is committed to preventing the origination of illegal robocalls on its network. We understand the harm illegal robocalls cause to consumers and the telecommunications infrastructure. This plan details the specific, reasonable steps the Company takes to avoid originating illegal robocall traffic, consistent with the FCC's rules and the TRACED Act.

2. STIR/SHAKEN Implementation Status

- **Full Implementation** - The Company has fully implemented the STIR/SHAKEN caller ID authentication framework on its entire IP network. All calls originating on our IP network are authenticated with an appropriate attestation level.

3. Know Your Customer (KYC) Vetting Process

The most effective way to prevent illegal robocalls is to prevent bad actors from accessing the network in the first place. The Company enforces strict KYC protocols for all new and existing commercial customers.

3.1 New Customer Onboarding

Before granting network access, the Company requires:

- **Identity Verification:** Collection of physical business address, primary contact person, email, and phone number.
- **Business Legitimacy:** Verification of State/Federal Tax ID (EIN) or Articles of Incorporation.
- **Nature of Traffic:** A signed declaration regarding the nature of the calls (e.g., transactional, telemarketing, political) and the expected volume.
- **Regulatory Compliance:** Confirmation that the customer is registered with the FCC (499 Filer ID) if applicable, and compliant with the Telephone Consumer Protection Act (TCPA) and Do-Not-Call (DNC) rules.

3.2 High-Risk Customer Restrictions

The Company exercises heightened scrutiny or refuses service to:

- Entities that cannot provide verifiable business documentation.
- Entities located in known high-risk jurisdictions without a valid U.S. presence.
- Entities previously identified in Industry Traceback Group (ITG) alerts.

4. Network Monitoring and Traffic Analysis

The Company actively monitors traffic patterns to identify anomalies indicative of illegal robocalling, such as unlawful spoofing or autodialing campaigns.

4. Automated Analytics

Our systems analyze Call Detail Records (CDRs) for the following "Red Flags":

- **Short Duration Calls:** High volumes of calls lasting less than 6 seconds.
- **Low Completion Rates:** A significantly low Average Seizure Ratio (ASR).
- **High Burst Volume:** Sudden, unexplainable spikes in traffic volume from a single trunk or DID.
- **Invalid Caller ID:** Use of unassigned, invalid, or "neighbor spoofed" numbers (numbers that look similar to the destination number).

5. Investigation and Enforcement

Upon detection of suspicious activity or receipt of a complaint, the Company takes the following steps:

1. **Suspend Traffic:** If the activity poses an immediate threat to the network or consumers, traffic is suspended immediately.
2. **Request Evidence:** The customer is contacted and required to provide proof of consent (for telemarketing) or a valid explanation for the anomaly within 24 hours.
3. **Termination:** If the customer cannot provide valid evidence of legality, or if they are found to be violating the Company's Acceptable Use Policy (AUP), the service is permanently terminated.
4. **Reporting:** The Company will report the bad actor to the FCC and/or the Industry Traceback Group if necessary.

6. Cooperation with Industry Traceback Group (ITG)

The Company is a cooperative participant in the traceback process.

- **Point of Contact:** We have designated a specific point of contact for traceback requests
 - Ryan Correa , support@leonardoandcompany.com

- **Response Time:** We are committed to responding to traceback requests from the ITG or the FCC within **24 hours**.
- **Information Sharing:** We will provide the identity of the upstream provider or the direct enterprise customer that originated the call in question.

7. Plan Review and Updates

This Robocall Mitigation Plan is reviewed continuously to ensure it remains effective against evolving robocall tactics. The Company's executive management is responsible for overseeing compliance with this plan.

Signed:



Name: Ryan Correa Leonardo **Title:** Partner