



RMD Plan Template: 47 CFR § 64.6305(d)(ii)-(iii)

1. Company Information

- **Company Name:** Powernet Wireless
- **FRN:** 0022782114
- **Date:** 2/24/2026

2. Mitigation Program: Preventing Illegal Traffic (64.6305(d)(ii))

- **KYC Procedures:** We comply with § 64.1200(n)(4) by requiring all new customers to agree to normal use and not to originate illegal calls. We conduct annual reviews of existing customers.
- **Upstream Provider Procedures:** We vet upstream providers by ensuring they are registered in the RMD and auditing their traffic.
- **Analytics & Blocking:** We use Atheral to monitor traffic for illegal patterns of high-volume short-duration calls, multiple invalid numbers.
- **Actionable Measures:** When illegal traffic is detected, we automatically block, suspend customer account, or terminate service.

3. Mitigation Program: Traceback Cooperation (64.6305(d)(iii))

- **Commitment:** Powernet Wireless formally commits to respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium within a reasonable time period.
- **Traceback Contact:** James Shepherd, Technical Contact,
James.shepherd@powersystemscomputers.com 325-866-1500
- **Cooperation:** We agree to cooperate fully in investigating and stopping any illegal robocallers utilizing our services.

4. Signature

- **Authorized Official:** James Shepherd
- **Title:** Technical Director
- **Signature:** A handwritten signature in black ink, appearing to read "J. Shepherd", written over a horizontal line.