

****ROBOCALL MITIGATION PROGRAM DESCRIPTION****

****BlueCloud IAAS, LLC****

****1. COMPANY INFORMATION****

Legal Entity Name: BlueCloud IAAS, LLC

Address: 5371 Allentown Pike, Unit D, Temple, PA 19560

Authorized Officer: Chris Rawlings, CEO

Traceback Contact: Chris Rawlings, CEO

Traceback Email: chris@blueuc.com

Traceback Phone: 484-335-1444 x201

****2. DESCRIPTION OF SERVICES****

BlueCloud IAAS, LLC provides hosted VoIP PBX systems to small businesses and non-profit organizations. Our primary focus is in the Managed Service Provider (MSP) space, where we deliver VoIP PBX services at no additional cost to our end users as part of our managed services offerings.

****3. ROLE IN THE CALL CHAIN****

BlueCloud IAAS, LLC serves end users directly. We do not act as an intermediate carrier, nor do we serve as a gateway provider handling international traffic. All outbound calls originated by our end users are passed through our upstream SIP trunk providers for delivery to the PSTN. We do not originate calls directly to the PSTN.

****4. UPSTREAM SIP TRUNK PROVIDERS****

BlueCloud IAAS, LLC utilizes the following upstream SIP trunk providers for call origination and termination:

- Commio
- AnveoDirect
- Flowroute
- VoIP.ms

All outbound calls pass through these upstream providers before reaching the PSTN. STIR/SHAKEN call signing is currently handled by our upstream carriers.

****5. STIR/SHAKEN IMPLEMENTATION STATUS****

As of the date of this filing, BlueCloud IAAS, LLC has not yet implemented the STIR/SHAKEN authentication framework on its network. We do not currently hold a STIR/SHAKEN certificate (STI certificate) or an Operating Company Number (OCN). Our upstream SIP trunk providers are responsible for STIR/SHAKEN call authentication on outbound calls.

BlueCloud IAAS, LLC intends to obtain its own STI certificate in the future to further enhance call authentication capabilities.

****6. ROBOCALL MITIGATION PROGRAM****

Pursuant to 47 CFR § 64.6305(a), BlueCloud IAAS, LLC has implemented the following robocall mitigation program, which includes reasonable steps to avoid originating illegal robocall traffic on its network:

****6.1 Customer Vetting (Know Your Customer)****

- Signed Service Agreements: All customers are required to execute a signed contract for MSP services prior to receiving VoIP PBX service.
- Face-to-Face Engagement: We work with all clients on a face-to-face basis, ensuring direct knowledge of and relationships with every customer we serve.
- Business Identity Verification: We verify business identity, including EIN and/or business license information, during the onboarding process.
- Caller ID Verification: We verify each customer's right to use the phone numbers and caller IDs configured on their accounts.

****6.2 Traffic Monitoring and Fraud Detection****

- SIP Packet Monitoring: We actively monitor every call's SIP packets for anomalies and suspicious activity.

- Carrier Fraud Detection Tools: We utilize fraud detection tools provided by our upstream carriers (Commio, AnveoDirect, Flowroute, and VoIP.ms) to identify and flag unusually high call volumes, short-duration calls, and calls to large number blocks.
- Rate Limiting: Customer accounts are subject to rate limits, typically set to a maximum of 2 calls per second, to prevent abusive call volumes.
- IP-Based Security: We employ IP blocking to prevent unauthorized IP addresses from attempting to send traffic through our systems (anti-SIP spam measures).

****6.3 Enforcement Actions****

BlueCloud IAAS, LLC takes the following graduated enforcement actions when illegal robocall activity is detected or reported:

1. Warning: The customer is notified of the suspected violation and given an opportunity to provide an explanation.
2. Suspension: If the activity is confirmed or continues, the customer's service is suspended pending further investigation.
3. Termination: If the customer is found to have engaged in illegal robocalling, their service is permanently terminated.

****6.4 Terms of Service****

Our customer agreements and terms of service explicitly prohibit the use of our services for illegal robocalling, including but not limited to violations of the Telephone Consumer Protection Act (TCPA) and FCC rules regarding robocalls.

****7. TRACEBACK COOPERATION COMMITMENT****

BlueCloud IAAS, LLC commits to the following:

- We will respond fully to all traceback requests within 24 hours of receipt from the Federal Communications Commission, law enforcement agencies, and the Industry Traceback Group (ITG).
- We will fully cooperate with the FCC, law enforcement, and the ITG in investigating and stopping any illegal robocallers that may use our services to originate calls.

Traceback Contact:

Name: Chris Rawlings

Title: CEO

Email: chris@blueuc.com

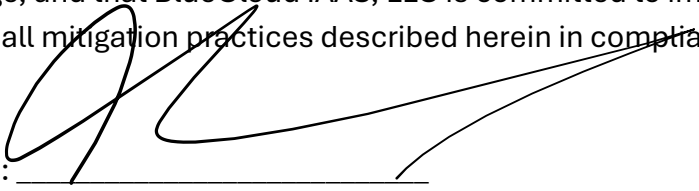
Phone: 484-335-1444 x201

****8. GOVERNMENT ACTIONS DISCLOSURE****

BlueCloud IAAS, LLC has never been the subject of any robocall-related government action, enforcement proceeding, or investigation.

****9. CERTIFICATION****

I, Chris Rawlings, CEO of BlueCloud IAAS, LLC, certify that the information contained in this Robocall Mitigation Program Description is true and accurate to the best of my knowledge, and that BlueCloud IAAS, LLC is committed to implementing and maintaining the robocall mitigation practices described herein in compliance with 47 CFR § 64.6305(a).

Signature: _____

Chris Rawlings, CEO

Date: 02/24/26