

ROBOCALL MITIGATION PROGRAM

Nectel Technologies Inc.

Prepared for Submission to the FCC Robocall Mitigation Database

Effective Date: February 24, 2026

Section 1 — Company Information

Legal Entity Name	Nectel Technologies Inc.
FCC Registration Number (FRN)	0036406700
Principal Place of Business	Illinois, United States
Service Territory	State of Illinois
Provider Type	Originating Voice Service Provider (Hosted VoIP Reseller)
Upstream VoIP Platform	SkySwitch (White-Label Hosted VoIP)
Approximate Subscriber Lines	Approximately 80
Effective Date of This RMP	February 24, 2026

Section 2 — Robocall Mitigation Point of Contact

The following individual is designated as the primary point of contact for matters related to this Robocall Mitigation Program, including complaints, traceback requests, and inquiries from the FCC and other voice service providers:

Name	Javier Solis
Title	Owner

Organization	Nectel Technologies Inc.
Phone	(312) 800-1261
Email	jsolis@necteltechnologies.com

Section 3 — STIR/SHAKEN Call Authentication

3.1 Implementation Status

Nectel Technologies Inc. has fully implemented STIR/SHAKEN call authentication in compliance with 47 CFR § 64.6301 and the FCC's call authentication framework. Nectel provides hosted VoIP services as a reseller of SkySwitch, a white-label VoIP platform. STIR/SHAKEN signing and attestation are performed at the network level by SkySwitch on behalf of Nectel and its end-user customers.

3.2 Attestation Levels

Nectel and its upstream provider SkySwitch apply the following STIR/SHAKEN attestation levels to outbound calls:

- Full Attestation (A-level): Applied to calls where Nectel is the originating service provider, the customer is known and authenticated, and the customer is authorized to use the calling number.
- Partial Attestation (B-level): Applied to calls where Nectel can verify the customer but cannot fully verify that the customer is authorized to use the specific calling number presented.
- Gateway Attestation (C-level): Applied where applicable to calls entering the network from outside sources that cannot be fully verified.

3.3 Certificate Authority and Token Signing

STIR/SHAKEN Personal Assertion Tokens (PASSporTs) are generated and signed using certificates issued by an authorized STIR/SHAKEN Certificate Authority (CA) and provisioned through SkySwitch's platform. Nectel does not independently sign PASSporTs but relies on SkySwitch's FCC-compliant implementation, which is registered in the FCC's Robocall Mitigation Database.

Section 4 — Robocall Mitigation Program

4.1 Customer Onboarding and Verification

Nectel Technologies Inc. implements the following customer verification procedures to prevent bad actors from using its network to originate illegal robocalls:

- Identity Verification: All prospective customers are required to provide verifiable business identification, including legal business name, address, and owner/officer contact information prior to service activation.

- **Use Case Review:** Nectel reviews the intended use case for all new customers. High-volume or automated calling use cases are subject to additional scrutiny and written disclosure of calling purpose.
- **Signed Service Agreement:** All customers must execute a written service agreement that explicitly prohibits the use of Nectel services to make illegal robocalls, transmit fraudulent caller ID information, or violate the Telephone Consumer Protection Act (TCPA) or Truth in Caller ID Act.
- **DNC Compliance Attestation:** Customers engaged in outbound calling campaigns must attest to compliance with the National Do Not Call Registry and applicable state do-not-call requirements.

4.2 Acceptable Use Policy (AUP) Enforcement

Nectel maintains and enforces an Acceptable Use Policy that expressly prohibits:

- The origination of calls using spoofed, falsified, or misleading caller ID information.
- Automated dialing campaigns (robocalls) without prior express written consent of the called party, where required by law.
- Any calling activity that violates the TCPA, Truth in Caller ID Act, or FCC regulations governing unwanted calls and texts.
- Resale or transfer of Nectel VoIP services to third parties without prior written authorization.

Violations of the AUP are grounds for immediate suspension or termination of service.

4.3 Ongoing Monitoring and Traffic Analysis

Nectel employs the following ongoing measures to monitor and analyze call traffic for signs of illegal robocall activity:

- **Call Volume Monitoring:** Nectel monitors outbound call volume patterns for anomalies, including sudden spikes in call attempts, high call failure rates, or short average call durations indicative of automated dialing.
- **Calling Number Review:** Nectel periodically reviews calling numbers in use by customers to identify numbers associated with complaints, Do Not Originate (DNO) lists, or known illegal robocall campaigns.
- **SkySwitch Platform Monitoring:** Nectel leverages SkySwitch's platform-level monitoring tools and alerts for unusual traffic patterns and potential abuse on the network.

4.4 Response to Traceback Requests and Complaints

Nectel Technologies Inc. is committed to cooperating with the FCC, the Industry Traceback Group (ITG), and other carriers in the investigation of illegal robocall activity. Nectel's procedures for responding to traceback requests include:

- **Prompt Response:** Nectel will respond to traceback requests from the ITG or FCC within the timeframes specified by applicable FCC orders and rules, generally within 24 hours of receipt.
- **Record Retention:** Nectel retains call records sufficient to support traceback investigations for a minimum period consistent with FCC requirements.

- Designated Contact: The Point of Contact identified in Section 2 is responsible for receiving, logging, and responding to all traceback requests and robocall complaints.
- Escalation: If a traceback investigation reveals that a Nectel customer is originating illegal robocalls, Nectel will take immediate action including suspension of the customer's outbound calling privileges and cooperation with law enforcement as appropriate.

4.5 Do Not Originate (DNO) List Compliance

Nectel observes published Do Not Originate (DNO) lists maintained by the ITG and other authoritative sources. Nectel works with SkySwitch to implement blocks on outbound calls using numbers that appear on DNO lists, including numbers that have been publicly identified as commonly spoofed in illegal robocall campaigns (e.g., government agency numbers, 911, and unallocated numbers).

4.6 Upstream Provider Coordination

As a hosted VoIP reseller, Nectel relies on SkySwitch for core network infrastructure, STIR/SHAKEN implementation, and platform-level call controls. Nectel coordinates with SkySwitch on the following robocall mitigation activities:

- STIR/SHAKEN signing and certificate management.
- Platform-level traffic monitoring and anomaly detection.
- Upstream blocking of calls identified as potentially fraudulent or spoofed.
- Compliance with FCC robocall mitigation orders and safe harbor provisions.

SkySwitch is independently registered in the FCC Robocall Mitigation Database and maintains its own FCC-compliant Robocall Mitigation Program.

Section 5 — Safe Harbor and Non-Origination Commitment

Nectel Technologies Inc. certifies that it does not knowingly originate, allow, or facilitate illegal robocalls on its network. In the event that Nectel receives a credible notice that it is carrying illegal robocall traffic, Nectel will take the following steps:

- Promptly investigate the identified traffic.
- Suspend or block the traffic source if the investigation confirms illegal robocall activity.
- Notify the complaining party and the FCC of actions taken.
- Implement any additional safeguards necessary to prevent recurrence.

Nectel acknowledges that failure to take reasonable steps to prevent illegal robocall traffic may result in downstream providers blocking all calls from Nectel's network and/or FCC enforcement action.

Section 6 — Program Review and Updates

Nectel Technologies Inc. will review this Robocall Mitigation Program no less than annually and will update it as necessary to reflect changes in the company's operations, technology, regulatory requirements, or best practices. Updated versions of this program will be submitted to the FCC Robocall Mitigation Database promptly upon completion.

Section 7 — Certification

I, the undersigned, am an authorized officer of Nectel Technologies Inc. and hereby certify that the information contained in this Robocall Mitigation Program is true, accurate, and complete to the best of my knowledge. I further certify that Nectel Technologies Inc. has implemented the robocall mitigation measures described herein and is committed to full compliance with applicable FCC regulations governing the prevention of illegal robocalls.

Signature: _____

Printed Name: Javier Solis

Title: Owner

Company: Nectel Technologies Inc.

Date: February 24, 2026