

Robo Call Mitigation Plan

1. Provider Identification

Company Name: Torch Wireless

Service Type: Wireless - Reseller

Service Scope: Providing nationwide B2B and direct-to-consumer telecommunications solutions throughout the United States.

2. Statement of STIR/SHAKEN Implementation Status

Our company utilizes an upstream carrier infrastructure that is fully STIR/SHAKEN enabled. All eligible outbound calls are authenticated and signed in accordance with FCC rules and industry standards.

- We participate in STIR/SHAKEN through our underlying carrier
- All eligible calls are authenticated and signed
- We do not operate our own STIR/SHAKEN signing infrastructure

Status: STIR/SHAKEN implemented through upstream provider

Upstream Provider(s):

Name:	AT&T Mobility Services LLC
RMD Filing ID:	RMD0003903
Address:	601 New Jersey Ave, NW Suite 650 Washington DC 20001
Phone:	800-337-5373
Email:	g03115@att.com

3. Summary of Robocall Mitigation Practices

Even though STIR/SHAKEN is enabled at the carrier level, our company maintains additional robocall mitigation procedures to prevent the origination of illegal robocalls.

! Know Your Customer (KYC) Procedures

Verify customer identity prior to provisioning services (where applicable):

- SSN and address validation
- Require signed Acceptable Use Policy (AUP) prohibiting illegal robocalling

B Traffic Monitoring & Analytics

The company does not use analytic systems, software, or third-party vendors at this time to identify and block illegal robocall traffic. We are not aware of any such systems in use by its wholesale provider.

C Call Blocking & Enforcement

- Immediate suspension or rate limiting of suspicious call traffic
- Termination of accounts found transmitting illegal robocalls
- Mandatory remediation steps before reinstatement

D. Complaint Handling

- Maintain a dedicated abuse-reporting email and ticketing process
- Respond to traceback requests from the Industry Traceback Group (ITG) within 24 hours
- Investigate all robocall complaints and document findings

4. Recordkeeping & Compliance Management

- Maintain customer onboarding records, traffic reports, complaint logs, mitigation actions, and traceback responses for a minimum of **24 months**
- Compliance officer designated to oversee robocall mitigation operations and external inquiries

Compliance Contact:

Name: Jeremy Gies
Title: EVP
Email: jgies@surgepays.com
Phone Number: 206-910-7277

5. Participation in Industry Traceback Group (ITG)

Our company cooperates fully with the ITG and other regulatory agencies, providing call traceback information promptly and accurately when requested.

6. Internal Policies and Employee Training

- Staff are trained annually on FCC robocall rules, STIR/SHAKEN processes, and fraud detection techniques
- Sales personnel trained to identify high-risk customers prior to account approval

7. Certification

Our company certifies that:

- We take reasonable and systematic measures to prevent origination of illegal robocalls
- We participate in STIR/SHAKEN through upstream provider
- We comply with 47 CFR § 64.6305 and all other FCC robocall mitigation requirements