

## **Robocall Mitigation Program Description**

We maintain a robocall mitigation program designed to prevent the origination and transmission of illegal robocalls on our network in compliance with FCC rules.

### **Traffic Monitoring and Analytics**

We monitor outbound call traffic for unusual volume patterns, short-duration call bursts, high answer-seizure ratios, and other indicators commonly associated with illegal robocalling. Automated systems and internal review processes are used to identify suspicious activity.

### **Customer Vetting and Know-Your-Customer (KYC) Procedures**

Prior to service activation, we verify customer identity and business legitimacy. We collect and maintain customer contact information, service use descriptions, and relevant documentation. We prohibit unlawful robocalling activity in our Terms of Service.

### **STIR/SHAKEN Call Authentication**

We implement STIR/SHAKEN call authentication for outbound traffic either directly or through our upstream carrier where technically feasible.

### **Complaint Handling and Traceback Cooperation**

We promptly investigate complaints and cooperate with industry traceback requests, including those initiated by authorized industry groups and regulatory authorities.

### **Enforcement Actions**

If illegal robocalling activity is detected, we take immediate corrective action, which may include call blocking, service suspension, or termination of the responsible account.

We review and update our robocall mitigation practices as necessary to remain compliant with applicable FCC regulations.