

ROBOCALL MITIGATION PROGRAM

Pursuant to 47 CFR § 64.6305(b)

Effective Date: March 10, 2026

1. Voice Service Provider Identification

Legal Entity Name:	Dunn Investing LLC
Doing Business As:	Planet Solara / TeleSolara
FCC Registration Number (FRN):	0038137642
Federal Employer ID (FEIN):	92-0687552
Principal Address:	961 NW 122nd Terr, Pembroke Pines, FL 33026
Main Telephone:	(561) 727-9274
Website:	planetsolara.com
State of Incorporation:	Florida (2022)
Authorized Representative:	Joshua D. Dunn, Manager
Contact Email:	contact@joshuadanieldunn.com

2. Description of Voice Services

Dunn Investing LLC, operating under the trade names Planet Solara and TeleSolara, provides hosted Voice over Internet Protocol (VoIP) and cloud Private Branch Exchange (PBX) services to small and medium-sized business customers within the United States. Services include inbound and outbound voice calling, call routing, voicemail, interactive voice response (IVR), and conferencing delivered over Session Initiation Protocol (SIP) trunking infrastructure.

The company acts as a voice service provider as defined in 47 CFR § 64.6300(o) and may also operate as an intermediate provider as defined in 47 CFR § 64.1600(i) on a call-by-call basis. Voice traffic is originated and terminated through licensed carrier interconnection partners.

3. STIR/SHAKEN Implementation Status

Dunn Investing LLC is committed to implementing the STIR/SHAKEN caller ID authentication framework on its network in accordance with the TRACED Act (Pub. L. 116-105) and FCC rules under 47 CFR § 64.6301.

As a small voice service provider, the company is currently operating under the FCC's extension for providers with fewer than 100,000 voice subscriber lines and is actively working toward full

STIR/SHAKEN deployment. In the interim, the company maintains the robocall mitigation program described in Section 4 below to ensure that its network is not used to originate illegal robocall traffic.

4. Robocall Mitigation Program

In compliance with 47 CFR § 64.6305(b), Dunn Investing LLC has implemented the following reasonable steps to avoid originating, and to effectively mitigate, illegal robocall traffic on its network:

4.1 — Know Your Customer (KYC) Verification

Prior to provisioning voice services, all prospective customers undergo identity and business verification. This process includes verification of the legal entity name, business registration, physical address, and intended use of voice services. Accounts requesting high-volume outbound calling capabilities receive enhanced scrutiny, including review of calling use cases and compliance attestations.

4.2 — Acceptable Use Policy and Contractual Prohibitions

All customers must agree to an Acceptable Use Policy (AUP) and Terms of Service that explicitly prohibit:

- Originating illegal robocalls, including prerecorded or artificial voice messages delivered without prior express consent as required by the Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227.
- Caller ID spoofing with the intent to defraud, cause harm, or wrongfully obtain anything of value, in violation of the Truth in Caller ID Act, 47 U.S.C. § 227(e).
- Transmitting calls to numbers listed on the National Do Not Call Registry without an applicable exemption.
- Any use of auto-dialing equipment to deliver unsolicited calls in violation of applicable federal or state law.

4.3 — Traffic Monitoring and Analysis

Dunn Investing LLC monitors call traffic patterns for anomalies indicative of illegal robocall activity. Monitored indicators include, but are not limited to:

- Abnormally high call volumes relative to a customer's profile or subscription tier.
- High ratios of short-duration calls (indicative of robocalling or number scanning).
- Calling patterns targeting sequential or randomly generated number ranges.

- Elevated rates of calls receiving a "SIP 603 Decline" or analogous rejection response.

When suspicious patterns are detected, the company will investigate promptly and may suspend the customer's outbound calling privileges pending resolution.

4.4 — Enforcement and Remediation

Upon confirmation that a customer has originated illegal robocall traffic, Dunn Investing LLC will take the following enforcement actions:

1. Immediately suspend the customer's outbound calling capability.
2. Notify the customer of the violation and the basis for suspension.
3. Cooperate fully with any law enforcement, FCC, or industry traceback investigation.
4. Terminate the customer's account if the violation is confirmed or if the customer fails to provide a satisfactory explanation within five (5) business days.

4.5 — Call Blocking and Number Reputation

The company utilizes upstream carrier call-blocking and analytics services to prevent known-bad traffic from transiting its network. Numbers flagged by industry databases (e.g., the Robocall Mitigation Database, carrier blocklists) are blocked or flagged for review before calls are completed.

5. Commitment to Traceback Cooperation

Dunn Investing LLC commits to fully cooperating with traceback requests from the Industry Traceback Group (ITG), the FCC, law enforcement agencies, and other voice service providers. The company will:

1. Respond to all traceback requests within **24 hours** of receipt.
2. Designate a single point of contact for traceback requests (see Section 6).
3. Maintain call detail records (CDRs) sufficient to identify the source of any call originated or transited through its network for a minimum period in accordance with applicable law and FCC rules.
4. Take immediate action to block or suspend traffic identified through traceback as illegal.

6. Designated Traceback Contact

Name:	Joshua D. Dunn
Title:	Manager

Email: contact@joshuadanieldunn.com
Phone: (561) 727-9274
Response Time: Within 24 hours

7. Certification

I, Joshua D. Dunn, as an authorized representative of Dunn Investing LLC, hereby certify under penalty of perjury that the information contained in this Robocall Mitigation Program is true and accurate, and that the company has implemented and will continue to maintain the mitigation measures described herein in accordance with 47 CFR § 64.6305(b) and all applicable FCC rules and orders.

Company Name: Dunn Investing LLC

Signature:



Printed Name: Joshua D. Dunn

Title: Manager

Date: March 10, 2026

This document constitutes the Robocall Mitigation Program of Dunn Investing LLC as required by 47 CFR § 64.6305(b). It is subject to periodic review and update.