



Trek Cellular, LLC, Robocall Mitigation Program Description

Robocall Mitigation Program Description

This document describes the robocall mitigation practices implemented by Trek Cellular, LLC, in accordance with the requirements of 47 CFR §64.6305 and the Federal Communications Commission's Robocall Mitigation Database requirements.

Trek Cellular is committed to preventing the origination and transmission of illegal robocalls and takes reasonable and appropriate measures to mitigate the risk of such traffic originating from its customers.

Company Service Overview

Trek Cellular operates as a provider of voice services to end user subscribers in certain scenarios. Trek Cellular relies on underlying facilities-based carrier partners to provide network infrastructure and call routing services. Because Trek Cellular does not control the underlying network infrastructure used to deliver voice services, Trek Cellular does not operate switching equipment, signaling systems, or other facilities required to independently implement the STIR/SHAKEN call authentication framework. As a result, Trek Cellular relies on its underlying carrier partners to implement STIR/SHAKEN on the IP portions of their networks and to apply network-level robocall detection and blocking measures.

Trek Cellular's services are designed primarily for individual consumer use on single subscriber devices. Due to the nature of the services provided, Trek Cellular's platform is not designed to facilitate high volume automated calling or large scale telemarketing campaigns. Accordingly, Trek Cellular's risk profile for originating illegal robocalls should be considered low.

STIR/SHAKEN Call Authentication

Trek Cellular does not independently implement the STIR/SHAKEN call authentication framework because it does not control the network infrastructure necessary to do so. Instead, Trek Cellular relies on its underlying facilities-based carrier partners, which maintain and operate the network infrastructure used to originate and route calls. These carrier partners have implemented STIR/SHAKEN authentication on the IP portions of their



networks and apply call authentication and verification processes consistent with FCC requirements.

Robocall Mitigation Measures

Although Trek Cellular does not operate network infrastructure, it takes reasonable steps to prevent the use of its services for illegal robocalling activity. Reliance on Network Level

Monitoring and Analytics

Trek Cellular relies on its underlying carrier partners to monitor voice traffic and detect suspicious or illegal robocall activity using network-level analytics tools and fraud detection systems. These systems may analyze call patterns, traffic volumes, and other behavioral indicators to identify potentially unlawful calling activity. Calls determined to be fraudulent or abusive may be blocked or otherwise mitigated by the underlying carrier's network level systems.

Trek Cellular itself does not use any call analytics systems to identify and block illegal traffic, and it does not use a third-party analytics vendor. Trek Cellular also relies on its underlying carrier partners to implement industry-recognized robocall mitigation practices, including call blocking policies, caller authentication measures, and traffic monitoring systems designed to detect suspicious calling behavior.

Subscriber Verification and Acceptable Use Policies

Trek Cellular takes reasonable steps to verify the identity of subscribers and to ensure that its services are not used for unlawful purposes. As a provider of voice services to end user subscribers, Trek Cellular does not deal with upstream providers. All calls are routed through its underlying carriers' networks upon origination. Subscribers are required to agree to terms of service and acceptable use policies prior to initiating service. These policies expressly prohibit the use of Trek Cellular's services for unlawful, fraudulent, abusive, or deceptive activities, including the origination of illegal robocalls, spoofed calls, or unlawful telemarketing.

Trek Cellular collects subscriber information as part of the service activation process and may use this information to identify and investigate potential misuse of its services. If Trek Cellular determines that a subscriber is using its services in violation of these policies or applicable law, Trek Cellular may take appropriate action, including:

- Suspension of service
- Termination of service



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- Blocking of traffic associated with the subscriber
- Cooperation with law enforcement or regulatory authorities

Subscribers who have previously been terminated for violations of Trek Cellular's policies may be prevented from re-establishing service.

Traceback Cooperation

Trek Cellular cooperates with traceback requests from the Federal Communications Commission, law enforcement agencies, and the Industry Traceback Group. Upon receipt of a traceback request, Trek Cellular will promptly investigate the relevant traffic and provide a response within 24 hours, where feasible. Trek Cellular will also cooperate with any follow-up investigations related to suspected illegal robocall activity.

Trek Cellular maintains appropriate internal processes to ensure that traceback requests are reviewed promptly and addressed by designated personnel responsible for regulatory compliance.

Cooperation with Law Enforcement and Regulatory Authorities

Trek Cellular is committed to cooperating with federal and state regulators, law enforcement agencies, and industry groups in efforts to combat illegal robocalls. Trek Cellular will:

- Respond to lawful requests for information regarding suspected robocall activity
- Provide relevant non-proprietary information when appropriate
- Assist in investigations related to unlawful robocalling or spoofing
- Implement additional robocall mitigation practices as required by law or regulation

Trek Cellular will continue to review and update its robocall mitigation practices as industry standards evolve and as additional guidance is provided by the FCC and other regulatory authorities.

Ongoing Program Review

Trek Cellular periodically reviews its robocall mitigation practices to ensure they remain effective and consistent with applicable FCC requirements and industry best practices. As Trek Cellular's business operations or technical capabilities evolve, Trek Cellular may modify or enhance its mitigation measures as appropriate.