

SWITCH MOBILE

Robocall Mitigation and Certification Plan

Pursuant to 47 CFR § 64.6305

Effective Date: March 9, 2026

Version: 2.0

1. Purpose and Scope

This Robocall Mitigation and Certification Plan ("Plan") establishes Switch Mobile's comprehensive framework for detecting, preventing, and reporting illegal robocall traffic in accordance with 47 CFR § 64.6305 and all applicable FCC rules and orders.

Switch Mobile operates as a Mobile Virtual Network Operator (MVNO) reselling voice and data services via BlueConnect (AT&T) for network connectivity and Telgoo5 as its Mobile Virtual Network Enabler (MVNE) for backend systems. Switch Mobile does not own or operate equipment in the call path that has the capability to create or modify SIP headers, and therefore does not have the technical capability to implement STIR/SHAKEN. The STIR/SHAKEN implementation obligation rests with the underlying provider(s) from whom Switch Mobile resells services.

This Plan applies to all voice traffic originated or processed by Switch Mobile through its underlying network providers, including calls utilizing North American Numbering Plan (NANP) resources pertaining to the United States in the caller ID field.

2. Company Information

Company Name	Switch Mobile
Primary Address	2193 North Bella Vista, Farmington, UT 84025

Other Business Names in Use	None
Previously Used Business Names	None
Provider Type	Voice Service Provider (Reseller / MVNO)
Foreign Voice Service Provider?	No
OCN	Not applicable — reseller without OCN
Underlying MVNE Provider	Telgoo5 (MVNE)
Underlying Network Provider	BlueConnect (AT&T)
Robocall Mitigation Contact Name	Troy Hyde
Title	CEO
Department	Executive
Business Address	2193 North Bella Vista, Farmington, UT 84025
Telephone	833-794-8240
Email Address	TroyHyde@switchmobile.com

3. STIR/SHAKEN Implementation Status

Switch Mobile hereby certifies its STIR/SHAKEN implementation status pursuant to 47 CFR § 64.6305(d)(1):

☒ **Option 3:** Switch Mobile has not implemented the STIR/SHAKEN authentication framework on any portion of its network.

Switch Mobile is a reseller of voice services and does not own, operate, or control equipment in the call path with the capability to create or modify SIP headers. Accordingly, Switch Mobile lacks the technical means to implement STIR/SHAKEN and is exempt from the STIR/SHAKEN implementation obligation pursuant to 47 CFR § 64.6301(b), which limits the obligation to providers that have "the capability to do so." Switch Mobile's underlying carrier, BlueConnct (AT&T), bears the STIR/SHAKEN implementation obligation with respect to calls carried on its platform on Switch Mobile's behalf. STIR/SHAKEN attestation is applied at the network level by the underlying carrier.

4. Prohibition on Filing Statement

Switch Mobile hereby certifies that:

- No prior certification filed by Switch Mobile in the Robocall Mitigation Database has been removed by Commission action; and
- Switch Mobile has not been prohibited from filing a certification in the Robocall Mitigation Database by the FCC.

5. Robocall Mitigation Program

5.1 Program Overview

Switch Mobile maintains a robocall mitigation program that includes reasonable steps to avoid originating or facilitating illegal robocall traffic, as required under 47 CFR § 64.6305(a)(2). Because Switch Mobile operates as a reseller without direct control over the underlying network infrastructure, its mitigation program is implemented in coordination with its MVNE provider, Telgoo5.

5.2 Know Your Customer (KYC) Obligations

Switch Mobile complies with its customer due diligence obligations under 47 CFR § 64.1200(n)(4), including:

- Verification of customer identity prior to provisioning voice services, including government-issued identification and, for business accounts, applicable business registration or tax identification documentation.
- Screening of new customers against known robocaller lists, FCC enforcement action databases, and industry watchlists prior to service activation.
- Written terms of service that explicitly prohibit the use of Switch Mobile services for any illegal robocalling, spoofing, or TCPA/TSR-violating activity.
- Ongoing monitoring, in coordination with Telgoo5, of customer calling behavior for anomalous patterns indicative of illegal robocall activity.
- Suspension or termination of service for any customer confirmed to be generating illegal robocall traffic.

5.3 Know Your Upstream Providers

Switch Mobile maintains procedures to verify and monitor its upstream providers, including:

- Verification that Telgoo5 and BlueConnect (AT&T) maintain active, non-delisted certifications in the FCC Robocall Mitigation Database prior to and during the term of any service agreement.
- Contractual requirements obligating upstream providers to comply with all applicable FCC anti-robocall regulations, including STIR/SHAKEN where applicable.
- Periodic review of upstream provider RMD certifications, at minimum annually and upon any material changes to provider relationships.

5.4 Analytics and Traffic Monitoring

Because Switch Mobile does not operate its own network equipment in the call path, call analytics and traffic monitoring are provided by Switch Mobile's MVNE, Telgoo5. Telgoo5 supplies the analytics systems used to identify and block illegal robocall traffic on Switch Mobile's behalf, including:

- Real-time traffic monitoring and anomaly detection for call volume, calling patterns, call duration, and caller ID behavior.
- Automated identification and blocking of calls exhibiting characteristics associated with illegal robocalling (e.g., high-volume sequential dialing, spoofed caller ID patterns, short-duration mass calling).
- Third-party analytics vendor(s): Analytics are provided through Telgoo5's platform. [Insert name of any specific third-party analytics vendor utilized by Telgoo5, if known; otherwise state: Provided by Telgoo5 — specific vendor details to be confirmed with Telgoo5.]
- Switch Mobile coordinates with Telgoo5 to ensure that identified illegal traffic is blocked and that flagged customers are escalated for review and, where confirmed, service termination.

5.5 Enforcement Actions Against Illegal Traffic

Switch Mobile, in coordination with Telgoo5, takes the following enforcement steps upon identification of potential illegal robocall activity:

- Prompt investigation of any customer or traffic source flagged by Telgoo5's monitoring systems.
- Suspension or termination of service to customers confirmed to be originating illegal robocall traffic.
- Reporting of confirmed illegal robocallers to the FCC, law enforcement, and the industry traceback consortium as appropriate.
- Retention of documentation of all enforcement actions for a minimum of two years.

6. Traceback Cooperation and Response Commitment

Switch Mobile hereby commits, in accordance with 47 CFR § 64.6305(a)(2) and (d)(1), to:

- Respond fully and within 24 hours to all traceback requests received from the FCC, law enforcement agencies, and the industry traceback consortium (USTelecom's Industry Traceback Group).
- Cooperate fully with the FCC, law enforcement, and the traceback consortium in investigating and stopping any illegal robocallers that use Switch Mobile's service to originate calls.
- Coordinate with Telgoo5 to ensure that call detail records and other relevant data sufficient to support traceback investigations are retained and made available in a timely manner.
- Maintain a designated point of contact responsible for receiving and responding to all traceback requests (see Section 7).
- Escalate traceback requests to senior management as necessary to ensure timely and complete responses within the required 24-hour window.

7. Designated Robocall Mitigation Contact

The following individual is designated as Switch Mobile's primary contact for all robocall mitigation-related matters, including traceback requests from the FCC, law enforcement, and the industry traceback consortium:

Name	Troy Hyde
Title	CEO
Department	Executive
Business Address	2193 North Bella Vista, Farmington, UT 84025
Telephone	833-794-8240
Email Address	TroyHyde@switchmobile.com

8. Regulatory Actions Disclosure

Pursuant to 47 CFR § 64.6305(d)(2)(iv), Switch Mobile discloses the following regarding formal regulatory, law enforcement, or Commission actions or investigations in the prior two years:

8.1 Actions Against the Filing Entity

☒ **None.** Switch Mobile certifies that it has not been the subject of any formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description, during the prior two years.

8.2 Actions Against Entities with Common Ownership, Management, Directors, or Control

☒ **None.** Switch Mobile certifies that, to the best of its knowledge, no entity sharing common ownership, management, directors, or control with Switch Mobile has been the subject of any such formal action or investigation during the prior two years.

8.3 Executive and Principal Enforcement History

☒ **None.** Switch Mobile certifies that none of its executives, officers, directors, or principals have a known history of enforcement actions for illegal robocalls, violations of the Telephone Consumer Protection Act (TCPA), violations of the Telemarketing Sales Rule (TSR), or related state law violations.

9. Acceptance of Traffic Obligations

Switch Mobile shall comply with its obligations under 47 CFR § 64.6305(g) regarding the acceptance of voice traffic:

- Switch Mobile shall accept calls directly from a domestic voice service provider only if that provider's filing appears and has not been de-listed in the Robocall Mitigation Database.
- Switch Mobile shall accept calls from foreign voice service providers or foreign intermediate providers using NANP resources pertaining to the United States only if those providers have active, non-de-listed RMD filings.
- Switch Mobile shall accept calls from gateway providers and non-gateway intermediate providers only if those providers have active, non-de-listed filings in the Robocall Mitigation Database.

Notwithstanding the above, Switch Mobile shall never block calls placed to 911 and shall make all reasonable efforts to ensure that calls from public safety answering points (PSAPs) and government emergency numbers are not blocked, in accordance with 47 CFR § 64.6305(g)(5).

10. Annual Recertification

Pursuant to 47 CFR § 64.6305(h), Switch Mobile shall recertify annually, on or before March 1 of each calendar year, that all information submitted to the Robocall Mitigation Database is true and correct.

Switch Mobile shall update its Robocall Mitigation Database filing within 10 business days of any material change to the information required under 47 CFR § 64.6305(d)(1) through (4), subject to the conditions set forth in 47 CFR § 64.6305(d)(5)(i) and (ii).

11. Officer Certification

The undersigned officer of Switch Mobile hereby certifies, under penalty of perjury under the laws of the United States, pursuant to 47 CFR §§ 1.16 and 64.6305, that:

- All calls originated on Switch Mobile's network are subject to the robocall mitigation program described in this Plan, consistent with 47 CFR § 64.6305(a).
- Switch Mobile has selected Voice Service Provider Certification Option C — no STIR/SHAKEN implementation — on the basis that Switch Mobile is a reseller without equipment in the call path capable of creating or modifying SIP headers, and is therefore exempt from the STIR/SHAKEN implementation obligation pursuant to 47 CFR § 64.6301(b).
- No prior certification has been removed by Commission action, and Switch Mobile has not been prohibited from filing in the Robocall Mitigation Database by the Commission.
- The information contained in this Plan and all filings submitted to the Robocall Mitigation Database is true, accurate, and complete to the best of the officer's knowledge, information, and belief.

Signature: Troy Hyde
Printed Name: Troy Hyde
Title: CEO
Date: 3/9/2026

12. Document Control and Review

Version	Date	Author	Description
1.0	March 9, 2026	Troy Hyde	Initial Plan

- This Plan shall be reviewed and updated at minimum annually, and promptly upon any material changes in Switch Mobile's network, service offerings, or applicable regulatory requirements.*