

ROBOCALL MITIGATION PLAN

Company: Bluepeak Networks LLC

Year: 2026

1. COMPANY OVERVIEW

Bluepeak Networks LLC provides wholesale telecommunications services, including voice termination and interconnection services for domestic and international carriers. The company operates as a service provider that delivers traffic for authorized customers and does not knowingly originate illegal robocalls or fraudulent traffic.

Bluepeak Networks LLC is committed to complying with all applicable FCC rules and industry standards related to robocall mitigation and network integrity. The company maintains internal procedures designed to prevent illegal, spoofed, or abusive traffic from originating or passing through its network.

2. OBJECTIVE OF MITIGATION PROGRAM

The purpose of this robocall mitigation plan is to define the policies and technical controls used by Bluepeak Networks LLC to:

- Prevent illegal robocalls from entering the network
- Monitor traffic for suspicious activity
- Ensure customers comply with regulatory requirements
- Respond to traceback and enforcement requests
- Protect upstream providers and downstream carriers

Bluepeak Networks LLC maintains a zero-tolerance policy for fraudulent, deceptive, or unlawful traffic.

3. CUSTOMER ONBOARDING AND KYC PROCEDURES

Before activating service, Bluepeak Networks LLC performs due diligence on all customers.

Customers must provide:

- Legal company registration documents
- FCC Registration Number (FRN) if applicable
- Form 499 Filer ID if required
- Contact and ownership information
- Description of intended traffic type
- Valid website and company email domain
- Banking or payment verification information
- Confirmation of compliance with FCC and TCPA rules

Bluepeak Networks LLC reserves the right to deny service to any customer that cannot be verified.

All customers must sign an agreement that prohibits:

- Caller ID spoofing
- Re-origination of traffic
- Fraudulent or illegal robocalls
- Traffic masking
- Any violation of FCC or state regulations
- Any activity intended to bypass lawful routing

Violation may result in immediate suspension or termination.

4. TRAFFIC MONITORING AND NETWORK CONTROLS

Bluepeak Networks LLC actively monitors network traffic to detect abnormal patterns.

Monitoring includes:

- Call volume analysis
- ASR / ACD monitoring
- Short duration call detection
- High-risk destination monitoring
- Customer behavior review

The Network Operations team reviews traffic on a continuous basis and investigates any suspicious activity.

If abnormal traffic is detected:

- Traffic may be blocked immediately
- Customer will be notified
- Investigation will be opened
- Service may be suspended until resolved

Repeat violations may result in permanent termination.

5. TRACEBACK AND COMPLAINT RESPONSE

Bluepeak Networks LLC cooperates with:

- FCC enforcement requests
- Industry Traceback Group
- Law enforcement agencies
- Upstream and downstream carriers

Upon receiving a traceback or complaint:

1. Traffic records are reviewed
2. Customer is contacted
3. Suspicious traffic is stopped if necessary
4. Corrective action is required

Failure to cooperate will result in disconnection.

6. STIR/SHAKEN AND MITIGATION PROGRAM

Bluepeak Networks LLC understands the requirements related to STIR/SHAKEN and robocall mitigation.

- Traffic received from customers must comply with authentication requirements when applicable
- Traffic not authenticated is subject to robocall mitigation procedures
- Customers are required to comply with all applicable authentication rules

Bluepeak Networks LLC certifies that it has implemented a robocall mitigation program designed to prevent illegal traffic from originating on its network.

7. INTERNAL COMPLIANCE POLICY

Bluepeak Networks LLC maintains internal policies that include:

- Customer verification procedures
- Traffic monitoring rules
- Complaint handling process
- Escalation procedures
- Service suspension authority

Staff responsible for network operations and customer management are trained to identify suspicious traffic and enforce company policies.

8. COMMITMENT TO REGULATORY COMPLIANCE

Bluepeak Networks LLC is committed to following all federal and state telecommunications regulations and to maintaining responsible network practices.

The company will continue to update its mitigation procedures as required to comply with FCC rules and industry standards.

Bluepeak Networks LLC certifies that it will respond to traceback requests and will cooperate with regulatory authorities to prevent illegal robocalls.

Authorized Representative:

Trevor Langford

Managing Director

Bluepeak Networks LLC