

Robocall Mitigation Plan

Summary of Robocall Mitigation Program

Pioneer Telecommunications, Inc. provides VoIP services to end-users as a reseller using CoreDial and SkySwitch platforms. While we do not operate our own underlying voice network or directly originate calls, we maintain a robust robocall mitigation program in compliance with 47 CFR § 64.6305(a).

- This includes proactively monitoring traffic patterns, enforcing strict user verification protocols, and terminating suspicious or abusive accounts.
- All new customers undergo KYC (Know Your Customer) checks including identity verification and business legitimacy reviews prior to activation following the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)
- We work with our underlying carriers (CoreDial, SkySwitch) to monitor call traffic patterns for spikes, high call volumes, and known robocall indicators.
- Pioneer enforces an Acceptable Use Policy that prohibits illegal robocall traffic and includes penalties for violations. High-risk destinations, short-duration bursts, and auto-dialer behavior are monitored and flagged.

STIR/SHAKEN Extensions

- We are a reseller of voice services hosted on VoIP platforms by CoreDial LLC and PayG LLC dba SkySwitch and do not have the capability to implement STIR/SHAKEN. CoreDial LLC and PayG LLC dba SkySwitch has implemented STIR/SHAKEN protocols in their IP Voice networks (RMD0002940).

Pioneer has the following upstream providers from which it receives voice traffic:

PayG LLC dba SkySwitch Arborcrest 1, 751 Arbor Way Suite 150 Blue Bell, PA 19422 Phone: 747.777.8100 Email: support@skyswitch.com	CoreDial LLC Arborcrest 1, 751 Arbor Way Suite 150 Blue Bell, PA 19422 Phone: 215.297.4400 Email: cdsupport@skyswitch.com
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Pioneer reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. Pioneer can block the originating number(s), terminating numbers(s),

trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Pioneer's networks.