

Palpac Supply Company LLC Robocall Mitigation Compliance

Palpac Supply Company LLC dba Palpac Communications (the “Company”) is committed to full compliance with the TRACED Act and FCC rules governing the mitigation of illegal robocalls. As a non-facilities-based / facilities-based (choose as applicable) voice service provider, we have implemented a comprehensive robocall mitigation program designed to prevent the origination and transmission of unlawful traffic across our network.

1. General Mitigation Practices

The Company employs a multi-layered approach to identify, prevent, and mitigate illegal robocalls, including:

- Monitoring traffic patterns for anomalies indicative of robocall campaigns (e.g., high-volume, short-duration calls, sequential dialing patterns)
- Utilizing industry-standard analytics and third-party tools to detect and block suspicious or illegal traffic
- Maintaining internal policies and procedures for responding to traceback requests from the Industry Traceback Group (ITG)
- Promptly investigating and, where necessary, suspending or terminating customers engaged in unlawful robocalling

2. Know Your Customer (KYC)

The Company has established and enforces robust Know Your Customer procedures prior to onboarding any customer and on an ongoing basis. These procedures include:

- Verification of customer identity, business registration, and beneficial ownership
- Collection of detailed information regarding the customer’s intended use of telecommunications services
- Risk-based assessment of customers, including scrutiny of high-risk use cases (e.g., outbound dialing platforms, lead generation, or call centers)
- Ongoing monitoring of customer traffic to ensure consistency with stated business purposes
- Immediate action (including suspension or termination) upon detection of suspicious or unlawful activity

3. Know Your Upstream Provider

The Company conducts due diligence on its upstream provider (QuestBlue Systems, Inc.) from whom it receives traffic, including:

- Verification of the upstream provider's identity and regulatory standing (including FCC registrations and RMD filings)
- Assessment of the upstream provider's robocall mitigation practices and policies
- Contractual requirements obligating upstream providers to comply with applicable robocall mitigation laws and to cooperate with traceback efforts
- Continuous monitoring of inbound traffic from upstream providers for indicators of illegal robocalls
- Swift mitigation actions, including blocking or terminating traffic from upstream providers that fail to adequately control unlawful traffic

4. STIR/SHAKEN Implementation (if applicable)

The company has implemented STIR/SHAKEN authentication in accordance with FCC requirements where applicable. We authenticate caller ID information where technically feasible and pass through attestation levels consistent with our role in the call path.

5. Traceback Cooperation

The Company fully cooperates with the Industry Traceback Group and law enforcement agencies by:

- Responding promptly within 24 hours to traceback requests
- Providing accurate and complete information regarding call origination and routing
- Taking immediate corrective action when illegal traffic is identified

6. Recordkeeping and Enforcement

The Company maintains records of its mitigation efforts, customer due diligence, and enforcement actions. We regularly review and update our robocall mitigation program to remain aligned with evolving FCC rules and industry best practices.