

WOODROW TECHNOLOGY SOLUTIONS LLC

ROBOCALL MITIGATION PLAN

(Filed Pursuant to 47 CFR § 64.6305 and Related FCC Rules)

Effective Date: 03/24/2026

1. Purpose and Regulatory Compliance

This Robocall Mitigation Plan (“Plan”) is adopted by Woodrow Technology Solutions LLC (“Company”) in compliance with applicable Federal Communications Commission (“FCC”) rules, including but not limited to **47 CFR § 64.1200**, **47 CFR § 64.6305**, and related orders implementing the **TRACED Act**.

The purpose of this Plan is to prevent the origination and transmission of illegal robocalls over the Company’s network and to ensure full cooperation with industry traceback and enforcement efforts.

2. Contractual Prohibitions

All customer agreements expressly prohibit the origination or transmission of illegal robocalls, as defined under **47 CFR § 64.1200**, over the Company’s network. Agreements also establish required traffic performance standards, including but not limited to ASR and LCD metrics.

Violations may result in immediate suspension or termination of service without notice. Customers responsible for illegal traffic waive any claim to confidentiality, and the Company may disclose relevant information to regulatory authorities, industry partners, and law enforcement consistent with federal requirements.

3. Customer Due Diligence

The Company implements Know-Your-Customer (KYC) procedures requiring all customers to provide accurate and complete information, including:

- Legal business name and physical address
- Primary contact information
- Jurisdiction of formation

- Federal Tax ID or foreign equivalent
- Description of services and traffic profile

The Company verifies such information and evaluates customer risk prior to activation of services, consistent with FCC guidance on robocall mitigation practices.

4. Traffic Monitoring and Enforcement

The Company actively monitors network traffic for anomalies and patterns indicative of illegal robocalling activity.

Traffic suspected of violating **47 CFR § 64.1200** is promptly investigated. The Company takes immediate enforcement action, including call blocking, suspension, or termination, where unauthorized or unlawful traffic is identified.

5. Traceback Response and Mitigation

The Company responds promptly to all traceback requests from authorized entities, including those acting pursuant to **47 CFR § 64.6305**.

Upon receipt of a traceback request, the Company:

- Investigates the identified traffic
- Requires detailed explanation from the originating customer
- Mandates immediate corrective action

Failure to provide timely and adequate remediation results in enforcement measures, including service termination.

6. Robocall Mitigation Database Compliance

In accordance with **47 CFR § 64.6305**, the Company requires all applicable customers to register in the FCC's Robocall Mitigation Database as a condition of service.

Customers that fail to comply are denied access to, or removed from, the Company's network.

7. Foreign-Originated Traffic Controls

The Company applies enhanced due diligence to customers and traffic originating outside the United States.

Additional verification and monitoring measures are implemented to ensure compliance with U.S. robocall regulations and this Plan prior to granting network access.

8. Call Blocking and Mitigation Measures

Consistent with **47 CFR § 64.1200(k)** and related FCC orders, the Company employs reasonable analytics and blocking measures, including:

- Blocking calls from known or suspected illegal robocall sources
 - Blocking calls to specific destinations where appropriate
 - Implementing mitigation tools to prevent recurrence
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9. Public Availability and Customer Notification

This Plan is made publicly available on the Company's website in accordance with FCC requirements.

Customers are notified of these policies, and the Company maintains records of such notifications.

10. Cooperation with Regulatory and Law Enforcement Authorities

The Company fully cooperates with:

- The Federal Communications Commission (FCC)
- Law enforcement agencies
- The Industry Traceback Group and other authorized entities

A designated point of contact is maintained to ensure timely handling of traceback requests and coordination with investigations.
