

Entity Name: Salient Innovations, Inc

FRN: 0038083010

Date: March 24, 2026

1. Introduction

Salient Innovations, Inc. ("The Company") is a small voice service provider serving residential and business end-users in New Mexico. The Company provides retail voice services through a private-label arrangement with its upstream provider, Atheral. This document outlines the specific reasonable steps the Company takes to avoid originating illegal robocall traffic on its network.

2. STIR/SHAKEN Implementation Status

The Company is a small provider (under 100,000 lines) that originates calls via an upstream provider. Currently, the Company does not possess its own Service Provider Code (SPC) token. As such, the Company is subject to a continuing extension under **47 CFR § 64.6304(b)** (inability to obtain an SPC token) and **47 CFR § 64.6304(d)** (non-IP network portions). The Company is working toward obtaining its own token to move toward partial or full STIR/SHAKEN implementation in the future.

3. Know Your Customer (KYC) Procedures

To prevent the origination of illegal robocalls, the Company follows strict "Know Your Customer" protocols:

- **Identity Verification:** The Company only provides voice services to customers who also maintain a verified internet service account. The identity and physical service address of every customer are confirmed prior to the commencement of service.
- **Service Agreements:** All customers must adhere to an Acceptable Use Policy (AUP) that strictly prohibits the use of the service for illegal robocalls, spoofing, or fraudulent activity.
- **Residential vs. Business:** The Company monitors the type of traffic intended for the account. High-volume outbound dialing is restricted on standard residential accounts.

4. Robocall Monitoring and Mitigation

The Company, in coordination with its upstream provider (Atheral), monitors network traffic for patterns consistent with illegal robocalling, such as:

- High volumes of short-duration calls.
- Spikes in call volume that deviate from established customer baselines.
- Low call-completion rates. If suspicious activity is detected, the Company reserves the right to suspend the account within 24 hours while an investigation is conducted.

5. Cooperation with Traceback Requests

The Company is committed to the fight against illegal robocalls. The Company pledges to:

- **Respond Fully:** Provide a complete response to any "Traceback" request from the FCC, law enforcement, or the Industry Traceback Group (ITG) within **24 hours**.

- **Identify Sources:** Work with upstream providers to identify and stop the source of any illegal traffic that is found to have originated on its network.

6. Officer Certification

I, Steven J. Grabiell, certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge.

Signed: *Steven J. Grabiell Owner/President*