

Robocall Mitigation Program Description

Filed Pursuant to 47 CFR § 64.6305

Effective Date: March 24, 2026

1. Company Information

Company Legal Name: CHR Creative

DBA Name (if applicable): Christensen Creative Consulting LLC

FCC Registration Number (FRN): 0027221274

Principal Business Address: 12300 SE Mallard Way Suite 216 Milwaukie, OR 97222

Robocall Mitigation Point of Contact: Michael Holtry

Contact Telephone: 503-427-1808 ext 5159

Contact Email: Michael@chrcreative.com

Upstream Voice Service Provider(s): CoreDial SkySwitch, Intermedia Elevate

2. Provider Role and STIR/SHAKEN Status

CHR Creative (hereinafter "the Company") is a reseller of Voice over Internet Protocol (VoIP) telecommunications services. The Company provides managed voice communications services to business end-users by reselling services provided by its upstream voice platform provider(s). The Company does not own, operate, or control the underlying network infrastructure through which calls are originated, routed, or terminated.

Because the Company lacks ownership or control of the network infrastructure necessary to implement the STIR/SHAKEN caller ID authentication framework, it is exempt from the STIR/SHAKEN implementation obligation pursuant to 47 CFR § 64.6301 and the FCC's First Caller ID Authentication Report and Order (FCC 20-42). STIR/SHAKEN authentication for all calls originated through the Company's service is performed by the upstream platform provider on whose facilities the calls traverse.

The Company's upstream provider(s) are registered in the FCC Robocall Mitigation Database and are responsible for signing and authenticating all outbound calls consistent with applicable FCC rules.

3. Robocall Mitigation Program — Reasonable Steps

Notwithstanding its exemption from STIR/SHAKEN implementation, the Company has established and maintains a Robocall Mitigation Program consisting of the following affirmative, reasonable steps to prevent the origination of illegal robocall traffic through its service:

3.1 Customer Verification and Know Your Customer (KYC)

- ☐ The Company onboards only legitimate business customers. Prior to activating service, the Company verifies customer identity and business legitimacy through a review of business name, address, and intended use of service.
- ☐ The Company does not knowingly provide service to entities that intend to use voice services for illegal robocalling, telemarketing fraud, caller ID spoofing, or any other unlawful purpose.
- ☐ The Company does not resell services to other voice service providers or wholesalers. All customers are direct business end-users.

3.2 Acceptable Use Policy and Contractual Prohibitions

- ☐ All customers are required to execute a service agreement containing an Acceptable Use Policy (AUP) that expressly prohibits use of the Company's voice services for illegal robocalling, caller ID spoofing, fraudulent telemarketing, or any violation of applicable federal or state law.
- ☐ The AUP expressly states that violation of these terms may result in immediate suspension or termination of service without prior notice.
- ☐ The Company reserves the right to terminate service to any customer found to be in violation of the AUP or applicable law.

3.3 Complaint Handling and Abuse Response

- ☐ The Company maintains a designated point of contact responsible for receiving and investigating reports of suspected robocall abuse originating from its customers.
- ☐ Upon receipt of a credible complaint or notice of suspected illegal robocall activity, the Company will investigate promptly and take appropriate remedial action, up to and including customer service termination.
- ☐ The Company will cooperate fully with the FCC, law enforcement, and the Industry Traceback Group in connection with any investigation of illegal robocalling.

3.4 Upstream Provider Verification

- ☐ The Company verifies that its upstream voice service provider(s) are registered in the FCC Robocall Mitigation Database prior to accepting voice services from them, and monitors for continued registration.

- ☐ The Company does not knowingly accept traffic from any provider not listed in the FCC Robocall Mitigation Database.

3.5 Traceback Response Commitment

- ☐ The Company commits to respond fully and within 24 hours to all traceback requests received from the FCC, law enforcement agencies, and the Industry Traceback Group (ITG).
- ☐ The Company will cooperate with the FCC, law enforcement, and the ITG in investigating and stopping any illegal robocallers that use its service to originate calls.
- ☐ The designated robocall mitigation point of contact listed in Section 1 of this document is responsible for managing all traceback responses.

4. Certification and Attestation

The undersigned, being duly authorized to act on behalf of CHR Creative hereby certifies under penalty of perjury that the foregoing Robocall Mitigation Program Description is true, accurate, and complete to the best of the undersigned's knowledge and belief. The Company certifies that:

- ☐ All calls originated through the Company's service are subject to the Robocall Mitigation Program described herein.
- ☐ The Company has not been prohibited from filing in the FCC Robocall Mitigation Database by Commission action.
- ☐ No prior RMD certification filed by the Company has been removed by Commission action.
- ☐ The Company has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation in the prior two years due to alleged involvement with illegal robocalling or caller ID spoofing.
- ☐ The Company commits to updating this filing within 10 business days if any material information changes.
- ☐ The Company commits to recertifying this filing annually by March 1 of each calendar year.

Signature: Michael Holtry

Printed Name: Michael Holtry

Title: Engineering Director

Company: CHR Creative

Date: 3/24/2026



chrcreative
CREATIVE SOLUTIONS. CUSTOM IT.

This document is submitted to the FCC Robocall Mitigation Database pursuant to 47 CFR § 64.6305. This document is a public record and will be made available on the FCC's website.