

Robocall Mitigation & Compliance Master Document

Entity: Cutting Edge Systems, Inc

Effective Date: March 2026

Part I: Robocall Mitigation Program (RMP)

1. STIR/SHAKEN Implementation Strategy

Cutting Edge Systems, Inc operates as a voice service provider utilizing upstream carrier partners for call termination. While we do not own the underlying IP-switching fabric, we fulfill our STIR/SHAKEN obligations by:

- Partnering exclusively with providers who have implemented STIR/SHAKEN.
- Ensuring calls are signed with the highest possible attestation (Level A) by verifying customer identity and number ownership through our KYC process.

2. Mandatory "Know Your Customer" (KYC)

We prevent the origination of illegal robocalls by vetting every customer before service provisioning. Our KYC process includes verifying legal business identities, Tax IDs, and physical locations. We require all customers to provide a "Use Case" description to ensure traffic aligns with legal telecommunications practices.

3. Real-Time Traffic Monitoring

The company employs automated monitoring to detect anomalies consistent with robocalling, including:

- **HVSD Analysis:** Monitoring for High-Volume, Short-Duration traffic.
- **Burst Patterns:** Identifying sudden spikes in call attempts (Calls Per Second).
- **Invalid Source Detection:** Blocking calls from unallocated or "Do-Not-Originate" (DNO) numbers.

4. Traceback & Enforcement

- **24-Hour Response:** We commit to responding to all Industry Traceback Group (ITG) and FCC requests within 24 hours.
- **Service Termination:** We reserve the right to immediately suspend or terminate any customer found to be originating illegal or fraudulent traffic.

Part II: Customer KYC Intake Form

Instructions: *This form must be completed and verified before any voice services are provisioned.*

1. Business Identity

- **Legal Entity Name:** _____
- **DBA (if applicable):** _____
- **Tax ID / EIN:** _____
- **Physical Address:** _____
- **Website:** _____

2. Traffic & Use Case Profile

- **Primary Purpose of Calls:** * ☐ Customer Support / Transactional
 - ☐ Emergency / Public Safety
 - ☐ Marketing / Sales (Consent-based)
 - ☐ Other: _____
- **Estimated Monthly Volume:** _____
- **Anticipated Calls Per Second (CPS):** _____
- **Avg. Call Duration:** ☐ <30 Sec ☐ 30-90 Sec ☐ >90 Sec

3. Compliance Contact (24/7 Traceback)

- **Point of Contact Name:** _____
- **Emergency Phone:** _____
- **Emergency Email:** _____

4. Certification

I certify that the traffic originated by this entity will comply with the TCPA and the TRACED Act.
I grant Cutting Edge Systems, Inc the right to audit my "Letter of Authorization" (LOA) for any Caller IDs used.

Authorized Signature: _____ **Date:** _____