

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Pursuant to 47 CFR § 64.6305

Filing Entity: Leaside Services Limited

FCC Registration Number (FRN): 0038213294

Business Address: Ifigeneias 17, Strovolos, Nicosia, Cyprus

Date of Filing: March 26, 2026

Provider Type: Foreign Voice Service Provider

1. Overview and Nature of Operations

Leaside Services Limited is a foreign entity incorporated and headquartered in Cyprus. The company uses U.S. telephone numbers (NANP) exclusively for legitimate outbound business communications with known customers and business contacts. Leaside Services Limited is not a domestic U.S. voice service provider, does not operate a U.S. telecommunications network, and does not originate mass robocall campaigns of any kind.

All U.S.-destined voice traffic originated by Leaside Services Limited is transmitted through a licensed upstream U.S.-based voice service provider, which bears primary responsibility for STIR/SHAKEN authentication and robocall mitigation on the U.S. network.

2. STIR/SHAKEN Implementation Status and Exemption

Leaside Services Limited does not have a STIR/SHAKEN implementation obligation. The applicable exemption is provided under 47 CFR § 64.6301(a) and the FCC's *Sixth Caller ID Authentication Report and Order* (FCC 23-18), which recognize that foreign voice service providers operating outside the U.S. network infrastructure are not subject to the STIR/SHAKEN mandate.

Specifically, as a foreign entity with no direct control over U.S. network infrastructure, Leaside Services Limited lacks the technical means to implement STIR/SHAKEN on its own. All call authentication obligations are fulfilled by our upstream U.S.-based voice service provider in accordance with applicable FCC rules.

Accordingly, Leaside Services Limited certifies under **Option 3: No STIR/SHAKEN Implementation**, consistent with its status as a Foreign Voice Service Provider without a STIR/SHAKEN obligation.

3. Robocall Mitigation Program — Reasonable Steps

Notwithstanding its exemption from STIR/SHAKEN, Leaside Services Limited has implemented the following reasonable steps to prevent the origination of illegal robocall traffic, consistent with the general mitigation standard under 47 CFR § 64.6305(a):

3.1 Limitation of Use to Legitimate Business Communications. U.S. telephone numbers are used exclusively for direct, person-to-person outbound calls to known customers, business partners, and counterparties. The company does not use automated dialing systems, predictive dialers, or pre-recorded message campaigns.

3.2 Call Volume Controls. Leaside Services Limited does not originate high-volume call campaigns. Call activity is limited to routine business operations and is monitored internally to detect any anomalous patterns.

3.3 Contractual Obligations with Upstream Provider. Our upstream U.S. voice service provider is contractually required to comply with all applicable FCC robocall mitigation rules, including STIR/SHAKEN implementation, traceback cooperation, and blocking obligations. These contractual provisions are designed to mitigate illegal robocall traffic at the network level.

3.4 Know-Your-Upstream-Provider Procedures. Leaside Services Limited has verified that its upstream U.S. voice service provider is listed in the FCC Robocall Mitigation Database and is compliant with applicable FCC rules prior to transmitting any traffic.

3.5 No Call Analytics Vendor. Given the low call volume and direct-to-counterparty nature of our calls, Leaside Services Limited does not currently employ a third-party call analytics vendor. Internal oversight is sufficient to detect and prevent illegal call activity.

3.6 Traceback Cooperation. Leaside Services Limited commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium (USTelecom), and to cooperating with such entities in investigating and stopping any illegal robocallers.

3.7 No Automated or Mass Calling. The company has no business purpose requiring robocalls, autodialers, or mass pre-recorded message delivery. Internal policy prohibits the use of U.S. numbers for any such purpose.

4. New and Renewing Customer Procedures

As a foreign entity that does not resell voice services to third parties or onboard external customers for U.S. calling, Leaside Services Limited does not have "new and renewing customer" obligations in the traditional sense. All U.S. number usage is internal to the company's own business operations. There are no downstream customers or resellers of U.S. voice services.

5. Principals, Affiliates, Subsidiaries, and Parent Companies

Leaside Services Limited has no parent companies, subsidiaries, or known affiliates that originate or carry U.S. telephone traffic. The company operates as an independent entity incorporated under the laws of the Republic of Cyprus.

6. Prior Regulatory Actions or Investigations

Leaside Services Limited has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings

of actual or suspected wrongdoing due to the transmission, encouragement, assistance, or facilitation of illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

7. Operating Company Number (OCN)

Leaside Services Limited does not hold a U.S. Operating Company Number (OCN), as it is a foreign entity and not a domestic U.S. telecommunications carrier.

8. Certification

The undersigned officer of Leaside Services Limited certifies that all of the calls that the company originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which includes reasonable steps to avoid originating illegal robocall traffic and a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

The undersigned further certifies that: (i) any prior certification has not been removed by Commission action; (ii) the company has not been prohibited from filing in the Robocall Mitigation Database by the Commission; and (iii) the company has not implemented the STIR/SHAKEN authentication framework on any portion of its network.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Officer Signature: _____

Printed Name: _____

Title: _____

Date: March 26, 2026

Company: Leaside Services Limited